

Port of Portland  
104(c) Response for Terminal 1 North

PORSF  
11.3.31.1.1 V1

EPA Question	Response	Reference
<b>Section 1.0 - Respondent Information</b>		
1. Provide the full legal, registered name and mailing address of Respondent.	Port of Portland 121 NW Everett Street Portland, Oregon 97209 4049	
2. For each person answering these questions on behalf of Respondent, provide a. full name, b. title, c. business address, and d. business telephone number, electronic mail address, and FAX machine number.	<p>1. Nicole LaFranchise                      Environmental Project Manager                      Port of Portland                      121 NW Everett                      Portland, OR 97209</p> <p>(503) 944-7323 - office                      (503) 944-7353 - fax</p> <p><a href="mailto:Nicole.LaFranchise@portofportland.com">Nicole.LaFranchise@portofportland.com</a></p> <p>2. Sara Moore                      Environmental Liability Analyst                      Port of Portland                      121 NW Everett                      Portland, OR 97209</p> <p>(503) 944-7033 - office                      (503) 548-5780 - fax</p> <p><a href="mailto:Sara.Moore@portofportland.com">Sara.Moore@portofportland.com</a></p> <p>3. Ash Creek Associates                      Amanda Spencer, Principal                      Ashleigh Fines, Staff, Geology Group                      9615 SW Allen Boulevard, Suite 106                      Portland, Oregon 97005-4814</p> <p>(503) 924-4707 - office                      (503) 924-4707 - fax</p> <p><a href="mailto:aspencer@ashcreekassociates.com">aspencer@ashcreekassociates.com</a>  <a href="mailto:afines@ashcreekassociates.com">afines@ashcreekassociates.com</a></p>	

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3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, please indicate here by providing that individual's name, address, telephone number, fax number, and, if available, electronic mail address.	<p>Nicole LaFranchise  Environmental Project Manager  Port of Portland  121 NW Everett  Portland, OR 97209</p> <p>(503) 944-7323 - office  (503) 944-7353 – fax</p> <p><u>Nicole.LaFranchise@portofportland.com</u></p>	
<b>Section 2.0 - Owner/Operator Information</b>		
4. Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937-Present). Please note that this question includes any aquatic lands owned or leased by Respondent.	<p>This response addresses the Terminal 1 North property formerly owned by the Port from 1971 to 2004.</p> <p>For the purposes of remedial investigation, the Terminal 1 North property is known as the Terminal 1 North Upland Facility and is divided into two operable units (OUs). OU1 consists of the waterfront portion of the Facility northeast of NW Front Avenue and extends riverward to the ordinary line of high water. The portion of the property southwest of NW Front Avenue is identified as OU2. The City of Portland is the current owner of OU1 and Emerson Hardwoods is the current owner of OU2. It is assumed that additional information on OU1 will be included in the City's 104(e) response. Emerson Hardwoods was not a recipient of a 104(e) request.</p> <p>The Terminal 1 North property is located between Willamette River Miles 10.5 and 10.7 at 2210 and 2400 NW Front Avenue and includes 18.6 acres of upland property on either side of NW Front Avenue. It is situated in the SW ¼ of Section 28 of Township 1 North, Range 1 East, Willamette Meridian.</p>	<p>See site investigation records at Tab 6, specifically:</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation</i>. September 30, 2005.</p>
a. Currently Owns	Not applicable. The Terminal 1 North property is currently owned by the City of Portland and Emerson Hardwoods.	See agreements at Tab 1.
b. Currently Leases	Not applicable.	
c. Currently Operates	Not applicable.	
d. Historically Has Owned	The Port acquired certain property and improvements within what is now OU1 and OU2 of the Terminal 1 North property from the City of Portland Commission of Public Docks (City CPD) effective January 1, 1971. In November 1987, the State Land Board, then acting through the Division of State Lands, quitclaimed to the Port any ownership interests the State had in OU1 above the line of ordinary high water. OU1 is partially comprised of riverbed filled by OU1 predecessor owners who had not purchased the filled riverbed from the State. The Port sold OU1 on February 27, 2004 to the City of Portland and sold OU2 to Emerson Hardwoods on April 5, 2004.	<p>See settlement agreement at Tab 1:</p> <p>See site investigation records at Tab 6, specifically:</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation</i>. September 30, 2005.</p>
e. Historically Has Leased	Not applicable.	

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f. Historically Has Operated	Not applicable.	
5. Provide a brief summary of Respondent's relationship to each Property listed in response to Question 4 above, including the address, Multnomah County Alternative Tax lot Identification number(s), dates of acquisition, period of ownership, lease, operation, or affiliation, and a brief overview of Respondent's activities at the Properties identified.	<p>The Port was the owner of certain property and improvements within what is now OU1 and OU2 of the Terminal 1 North property: OU1 from January 1, 1971 and November 1987 to February 2004; and OU2 from January 1, 1971 to April 2004.</p> <p>The address for the Terminal 1 North property, along with the Multnomah County Alternative Tax Lot Identification Numbers for each are as follows:</p> <p><b><u>OU1</u></b>  Address: The current address is 2400 NW Front Avenue. Other addresses identified as historically associated with OU1 include 2210 and 2500 NW Front Avenue.</p> <p>Location Description: OU1 is approximately 15.8 acres and is bounded by Slip No. 2 to the southeast, NW Front Avenue to the southwest, the Sulzer Pumps (US) property to the northwest, and the Willamette River to the northeast</p> <p>Assessor Description: Tax Lot 900; Tax Lot ID #1N1E28B 900; Total Acreage: 15.8; Port acquired the terminal in 1971 from the City CPD and sold what is known as OU1 to the City on February 27, 2004. The Multnomah county Alternative Tax Lot Identification Number for Tax Lot 900 is R766004790.</p> <p><b><u>OU2</u></b>  Address: 2303 NW Front Avenue. Other addresses identified as historically associated with OU2 include 500 N. Front Avenue.</p> <p>Location Description: OU2 is approximately 2.6 acres and is bounded by NW Front Avenue to the northeast, the Columbia River Pensioners property to the northwest, railroad tracks to the southwest, and the Emerson Hardwoods property to the southeast.</p> <p>Assessor Description: Tax Lot 200; Tax Lot ID #1N1E28CA 200; Total Acreage: 2.52; Port acquired Tax Lot 200 of OU2 in 1971 from the City CPD and sold it to Emerson Hardwoods on April 5, 2004. The Multnomah county Alternative Tax Lot Identification Number for Tax Lot 200 is R649744630.</p> <p>During the Port's ownership, the former Terminal 1 North property (OU1) was used primarily for wharfing, storage and distribution of finished products.</p>	<p>See property transaction records at Tab 5, specifically:</p> <p>Hahn and Associates, Inc. 2002. <i>A Phase I Environmental Site Assessment, Terminal 1 North, 2210, 2303, 2400, 2440, and 2500 NW Front Avenue, Portland, Oregon.</i> September 12, 2002.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation.</i> September 30, 2005.</p>
6. Identify any persons who concurrently with you exercises or exercised actual control or who held significant authority to control activities at each Property, including:	See response to 6 (a) through (i) below.	
a. partners or joint venturers;	Not applicable.	

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b. any contractor, subcontractor, or licensor that exercised control over any materials handling, storage, or disposal activity on the Property; (service contractors, remediation contractors; management and operator contractors, licensor providing technical support to licensed activities);	<p>Material handling and disposal at the Terminal 1 North property are described further in the responses to Question 64. The contractor associated with that occurrence is as follows:</p> <ul style="list-style-type: none"> <li>Terra Hydr - excavated and transported 165.8 tons of contaminated soil from a UST decommissioning 1998. The material was transported to TPS Technologies in Portland, Oregon for treatment.</li> </ul> <p>See also response to Questions 6 (f), (g) and (h) and, 13(i) below.</p>	
c. any person subleasing land, equipment or space on the Property;	See response to Question 6 (f), (g) and (h)	
d. utilities, pipelines, railroads and any other person with activities and/or easements regarding the Property;	<p>City of Portland (had easements across the property for sewer lines)  Emerson Hardwoods (had an easement across the property for sewer)</p>	<p>See agreements at Tab 1.</p> <p>See deeds and easements at Tab 2.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation</i>. September 30, 2005.</p>
e. major financiers and lenders;	Not applicable.	
f. any person who exercised actual control over any activities or operations on the Property; g. any person who held significant authority to control any activities or operations on the Property; h. any person who had a significant presence or who conducted significant activities at the Property; and	<p>During the Port's ownership, the following entities held leases, subleases, or utilized the dock/warehouse facilities, exercised or had the authority to exercise control over the activities and operations, and/or had a significant presence or conducted significant activities:</p> <ol style="list-style-type: none"> <li>American Mail Lines (1955-1975)</li> <li>Benson Industries (1998-2001)</li> <li>Boise Cascade (1999-2000)</li> <li>City of Portland (2002-2004)</li> <li>Classical Chinese Garden Trust (1999-2000)</li> <li>Crown Zellerbach (1963-1978)</li> <li>Ebony Iron Works (2000)</li> <li>Enesco Imports (1976-1977)</li> <li>General Implement Distributors (1976)</li> <li>James River II (1988-1989)</li> <li>Lane Bryant Oregon, Inc. (1975)</li> <li>May Trucking Company (1990-1994)</li> <li>Multnomah County Temporary Booking Facility (2001-2002)</li> <li>New York Merchandise Company, Inc. (1973-1974)</li> </ol>	<p>See agreements at Tab 1.</p> <p>See property transaction records at Tab 5, specifically:</p> <p>GeoEngineers. 1996. <i>Environmental Review Update, Terminal One-Western Transportation Facility, 2200 NW Front Avenue, Portland, Oregon</i>. June 4, 1996.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility, Remedial Investigation</i>. September 30, 2005.</p>

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	<p>15. Nordstrom's (1977-1979)  16. North Pacific Lumber (1961-1983)  17. Oscar-Perschardt USA, Inc. (1975)  18. Port of Cascade Locks (1992-1997)  19. Sassoon-Scherman Fibers Company (1978)  20. Standard Steel Companies (1978-1982)  21. Tri-Star Transload (1999-2000)  22. West Coast Paper Co. (1999-2000)  23. Western International Forest Products (dba Bear Springs Forest Products) (1984-2004)  24. Western Transportation (1986-1988)</p> <p>It should be noted that the reference documents identify additional parties that have not been included in the list above. Further scrutiny of these entities for this 104(e) response revealed their operations were connected with addresses and locations that are not associated with the Terminal 1 North Property.</p>	
i. government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Property.	<p>During the Port's ownership of the Terminal 1 North property, the following government entities had interest or involvement:</p> <p>City of Portland (2002-2004)  Port of Cascade Locks (1992-1997)  State Land Board (DSL) (1859-1987)  Multnomah County Sherriff (2001-2002)</p>	<p>See agreements at Tab 1.</p> <p>See property transaction records at Tab 5, specifically:</p> <p>Hahn and Associates, Inc. 2002. <i>A Phase I Environmental Site Assessment, Terminal 1 North, 2210, 2303, 2400, 2440, and 2500 NW Front Avenue, Portland, Oregon.</i> September 12, 2002.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation.</i> September 30, 2005.</p>
7. Identify and describe any legal or equitable interest that you now have, or previously had in each Property. Include information regarding the nature of such interest: when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed, if applicable. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, purchase and sale agreements, partnership agreements, etc.).	<p>The Port acquired certain property and improvements within what is now OU1 and OU2 of the Terminal 1 North property from the City of Portland Commission of Public Docks (City CPD) effective January 1, 1971. In November 1987, the State Land Board, then acting through the Division of State Lands, quitclaimed to the Port any ownership interests the State had in OU1 above the line of ordinary high water. OU1 is partially comprised of riverbed filled by OU1 predecessor owners who had not purchased the filled riverbed from the State. The Port sold OU1 on February 27, 2004 to the City of Portland and sold OU2 to Emerson Hardwoods on April 5, 2004.</p>	<p>See agreements at Tab 1.</p> <p>See CPD bargain and sale deed at Tab 2.</p>

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8. If you are the current owner and/or current operator, did you acquire or operate the Property or any portion of the Property after the disposal or placement of hazardous substances, waste, or materials on, or at the Property? Describe all of the facts on which you base the answer to this question.	Not applicable.	
9. At the time you acquired or operated the Property, did you know or have reason to know that any hazardous substance, waste, or material was disposed of on, or at the Property? Describe all investigations of the Property you undertook prior to acquiring the Property and all of the facts on which you base the answer to this question.	The historical documents relating to the Port's acquisition of the Terminal 1 North property from the City CPD do not indicate the Port had prior knowledge or reason to know that any hazardous substance, waste, or material was disposed of on, or at the property. The acquisition of Terminal 1 North was performed pursuant to State legislation, a vote by the citizens of Multnomah, Clackamas and Washington Counties, a City of Portland Ordinance, and action by the Port Commission, based on the determination that it was in the best interest of the people to consolidate public dock ownership within one government entity, from the City to the Port.	See CPD bargain and sale deed at Tab 2.  See additional references at Tab 8, specifically:  ORS 778.020; City Ordinance No. 131957; and Election and Port Commission Documents.
10. Identify all prior owners that you are aware of for each Property identified in Response to Question 4 above including, but not limited to, the following entities believed to have owned one or more of your Properties:  a. City of Portland b. Freightliner LLC c. Oregon Shipbuilding Corporation d. Shipyard Commerce Center LLC e. Union Pacific Railroad; and f. West Coast Terminal Company  For each prior owner, further identify, if known and if relevant, and provide copies of any documents you may have regarding:  i. the dates of ownership ii. all evidence showing that they controlled access to the Property; and iii. all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Property during the period that they owned the Property.	Former owners of the Terminal 1 North property include:  <ul style="list-style-type: none"> <li>• Eastern and Western Lumber Company (1903-1946)</li> <li>• City of Portland, Commission of Public Docks (1946-1971)</li> <li>• Port of Portland (1971-2004)</li> <li>• State of Oregon (1859-1987)</li> </ul> <p>None of the entities listed in bullets (b) through (f) Question 10 previously owned the Terminal 1 North property Parcel, but as mentioned, the City of Portland is a prior owner of both OU1 and OU2 (1946-1971), leased OU1 from the Port (2002-2004), and is the current owner of OU1 (2004-present).</p> <p>Periods of ownership are reflected by those deeds that are available and which are attached at Tab 2.</p>	See deeds at Tab 2.
11. Identify all current or prior operators of the Property, including lessors, you are aware of for each Property identified in response to Question 4 above including, but not limited to, the following entities: a. Beall Pipe, Inc.; b. Benson Industries, Inc.; c. Cargill, Inc.; d. Cascade General; e. Cascade West; f. Chevron USA; g. Classical Chinese Garden Trust; h. Hunt Foods, Inc.; i. Kaiser; j. Multnomah County Sheriff's Office;	Of the entities listed in (a) through (z) of Question 11, only Benson Industries, Classical Chinese Garden Trust, Multnomah County Sheriff's Office, Port of Cascade Locks, Western Transportation, Tristar Transload, and West Coast Paper Company are known to have been prior operators of the Terminal 1 North property, as explained below.  Currently available records reflect the following prior operators at the property:  1. Eastern and Western Lumber Company <ul style="list-style-type: none"> <li>i. 1903 to 1946</li> <li>ii. Owned and operated OU1 and OU2 as a sawmill, planning mill, steam plant/drying kilns, and lumber storage yard.</li> </ul>	See agreements at Tab 1.  See deeds at Tab 2.  See property transaction records at Tab 5, specifically:  Hahn and Associates, Inc. 2002. <i>A Phase I Environmental Site Assessment, Terminal 1 North, 2210, 2303, 2400, 2440, and 2500 NW Front Avenue, Portland, Oregon.</i> September 12,

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<p>k. Pacific Molasses Company;  l. Pacific Pine;  m. Port of Cascade Locks.;  n. Portland Municipal Airport;  o. Safety Kleen;  p. Shaver Transportation Company;  q. Speed Towing;  r. St. John Auto Wrecking Yard;  s. Thermo Pressed Laminates, Inc.;  t. Tristar Transload, Inc.;  u. U.S. Maritime Commission;  v. Ultraboard;  w. War Assets Administration;  x. West Coast Paper Company;  y. Western Transportation.; and  z. Willamette Iron and Steel Corporation.</p> <p>For each such operator, further identify, if known and if relevant, and provide copies of any documents you may have regarding:</p> <p>i. the dates of operation;  ii. the nature of prior operations at the property;  iii. all evidence that they controlled access to the property; and  iv. all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Property during the period that they operated on the Property.</p>	<p>iii. Deeds, Phase I ESA (Hahn, 2002)  iv. No documented evidence of releases was identified.</p> <p>2. City of Portland  i. &amp; ii. Owned facility (OU1 and OU2) from 1946 to 1971; used Warehouse 3 at OU1 from 1965-1970 for storage; leased OU1 from the Port 2002-2004 for Big Pipe Project tunnel construction; Purchased OU1 in 2004 to continue Big Pipe tunnel construction; Current Owner of OU1.  iii. Deeds, Phase I ESA (Hahn, 2002) [add any others]; RI; stormwater investigation docs  iv. Evidence of release or threat of release from stormwater during 2002 to present are supplied at Tab 6 and in the pending Stormwater Cleanout Results report (a copy will be provided to EPA upon its submission to DEQ).</p> <p>3. Emerson Hardwood  i. 2004 to present  ii. Current owner and operator of OU2.  iii. RI Report (BBL/Ash Creek/Newfields, 2005), Polk City Directories  iv. No documented evidence of releases was identified.</p> <p>4. A.C. Greenwood Contractors  i. 1934  ii. Retail for wood and coal dealer.  iii. RI Report (BBL/Ash Creek/Newfields, 2005), Polk City Directories  iv. No documented evidence of releases was identified.</p> <p>5. American Mail Line  i. 1955 to 1975  ii. Shipping agents and ship owner, used Pier D and Warehouse 101 for unspecified purposes.  iii. Phase I ESA (Hahn, 2002)  iv. No documented evidence of releases was identified.</p> <p>6. Benson Industries  i. 1998 to 2001  ii. Leased Warehouse No. 3 and Warehouse No. 103 at OU1 for assembling and distribution of glass windows and aluminum frames  iii. Port lease files  iv. No documented evidence of releases was identified.</p> <p>7. Boise Cascade  i. 1999 to 2000  ii. Leased a portion of the yard area at OU1 to park truck trailer used in the paper and wood products business.  iii. Port lease files  iv. No documented evidence of releases was identified.</p> <p>8. Builders Supply Co.  i. 1949 to &gt;1950s  ii. Leased a portion of OU2 for commercial operations  iii. RI Report (BBL/Ash Creek/Newfields, 2005)  iv. No documented evidence of releases was identified.</p> <p>9. Classical Chinese Garden Trust</p>	<p>2002.</p> <p>GeoEngineers. 1996. <i>Environmental Review Update, Terminal 1-Western Transportation Facility, 2200 NW Front Avenue, Portland, Oregon.</i> June 4, 1996.</p> <p>GeoEngineers. 1996. <i>Report of Phase I Environmental Site Assessment, Bear Springs Lumber Distribution Facility, 2303 Northwest Front Avenue, Portland, Oregon.</i> August 27, 1996.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation.</i> September 30, 2005.</p> <p>Port of Portland. 2000. <i>Preliminary Assessment, Port of Portland, Terminal 1, 2200 NW Front Avenue, Portland, Oregon 97209.</i> September 18, 2000.</p> <p>See spills and releases information at Tab 7.</p>

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	<ul style="list-style-type: none"> <li>i. 1999 to 2000</li> <li>ii. Leased a portion of Warehouse 101 at OU1 for warehousing and staging of building materials and components, including wood products, beams, columns, structural steel, etc. and assembly of subcomponents.</li> <li>iii. Port lease files</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>10. Crown Zellerbach</p> <ul style="list-style-type: none"> <li>i. 1963 to 1978</li> <li>ii. Used warehouse space for storage</li> <li>iii. Port lease files</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>11. Durkee Famous Foods, Inc.</p> <ul style="list-style-type: none"> <li>i. 1930</li> <li>ii. Edible oil suppliers.</li> <li>iii. RI Report (BBL/Ash Creek/Newfields, 2005), Polk City Directories</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>12. Ebony Iron Works</p> <ul style="list-style-type: none"> <li>i. 2000</li> <li>ii. Leased Warehouse 101 for storage of steel beams.</li> <li>iii. Port lease files</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>13. Enesco Imports</p> <ul style="list-style-type: none"> <li>i. 1976 to 1977</li> <li>ii. Used Warehouse 3 at OU1 for storage</li> <li>iii. Port lease files</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>14. General Implement Distributors</p> <ul style="list-style-type: none"> <li>i. 1976</li> <li>ii. Used Warehouse 3 at OU1 for storage</li> <li>iii. Port lease files</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>15. Grange Coop Wholesale</p> <ul style="list-style-type: none"> <li>i. 1962 to 1963</li> <li>ii. Leased unspecified warehouse space at Terminal 1</li> <li>iii. City CPD lease files</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>16. Holman Transfer Company</p> <ul style="list-style-type: none"> <li>i. 1955 to 1960</li> <li>ii. Leased Warehouse 4 at OU2 for unknown purposes</li> <li>iii. Phase I ESA (Hahn, 2002), Polk City Directories</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>17. International Longshore and Warehouse Union</p> <ul style="list-style-type: none"> <li>i. 1994 to 2004</li> </ul>	



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	<ul style="list-style-type: none"> <li>ii. Held a permit &amp; right of entry for a parking lot at OU2</li> <li>iii. Port lease files</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>18. James River II</p> <ul style="list-style-type: none"> <li>i. 1988 to 1989</li> <li>ii. Used a portion of yard space at the head of Slip No. 2 for storage of trucks and materials related to the paper and wood products industry</li> <li>iii. Port lease files</li> <li>iv. In August 1995, James River Corporation informed the Port it observed six drums on the south side of Warehouse 103, one of which had a stencil marked "Lube Engine Oil." The surrounding asphalt showed discoloration indicative of a petroleum-based product. A drain (type unknown) was observed in the vicinity of the drums, but no releases to the drain were reported. See documentation at Tab 7.</li> </ul> <p>19. Lane Bryant Oregon, Inc.</p> <ul style="list-style-type: none"> <li>i. 1975</li> <li>ii. Used Warehouse 3 at OU1 for storage</li> <li>iii. Port lease files</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>20. Loyal Legion of Loggers &amp; Lumberman's Social Hall</p> <ul style="list-style-type: none"> <li>i. 1935 to 1944</li> <li>ii. Social hall at OU2</li> <li>iii. Phase I ESA (Hahn, 2002), Polk City Directories</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>21. M&amp;B Transfer</p> <ul style="list-style-type: none"> <li>i. 1970</li> <li>ii. Car lot distributors, leased OU2 for warehouse space</li> <li>iii. Phase I ESA (Hahn, 2002), Polk City Directories</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>22. Manning Warehouse Company (Furniture Division)</p> <ul style="list-style-type: none"> <li>i. 1960</li> <li>ii. Leased Warehouse 4 at OU2 for unknown purposes</li> <li>iii. Phase I ESA (Hahn, 2002)</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>23. May Trucking Company</p> <ul style="list-style-type: none"> <li>i. 1990 to 1994</li> <li>ii. Subleased from Western Transportation buildings for office space and equipment storage</li> <li>iii. Port lease files, Environmental Review Update (GeoEngineers, 1996) and Phase I ESA (Hahn, 2002)</li> <li>iv. During a site inspection in 1996, a bucket of oily material was observed at the May Trucking leasehold that appeared to have filled with rainwater and overflowed causing the bucket's contents to spill to the surrounding surface area. Following its discovery, the Port contacted Western Transportation, who reportedly removed the bucket. See documentation at Tab 7.</li> </ul> <p>24. Miesen Fuel Company, aka L.E. Miesen Co., Inc.</p> <ul style="list-style-type: none"> <li>i. 1935</li> </ul>	

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	<ul style="list-style-type: none"> <li>ii. Retail wood and coal dealer at OU2</li> <li>iii. Phase I ESA (Hahn, 2002), Polk City Directories</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>25. Multnomah County Temporary Booking Facility</p> <ul style="list-style-type: none"> <li>i. 2001 to 2002</li> <li>ii. Used OU1 for a temporary booking facility</li> <li>iii. Phase I ESA (Hahn, 2002)</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>26. New York Merchandise Company, Inc.</p> <ul style="list-style-type: none"> <li>i. 1973 to 1974</li> <li>ii. Used Warehouse 3 at OU1 for storage</li> <li>iii. Port lease files</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>27. Nordstrom's, Inc.</p> <ul style="list-style-type: none"> <li>i. 1977 to 1979</li> <li>ii. Used Warehouse 4 at OU2 for storage</li> <li>iii. Port lease files</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>28. North Pacific Lumber Company</p> <ul style="list-style-type: none"> <li>i. 1961 to 1983</li> <li>ii. Used Warehouse 3 at OU1 for lumber storage</li> <li>iii. Port lease files</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>29. Oscar-Peschardt USA, Inc.</p> <ul style="list-style-type: none"> <li>i. 1975</li> <li>ii. Used Warehouse 3 at OU1 for storage</li> <li>iii. Port lease files</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>30. Pacific Northern Terminal Company</p> <ul style="list-style-type: none"> <li>i. 1950 to ~1971</li> <li>ii. Maintained rail leads at terminal</li> <li>iii. City CPD agreements</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>31. Pacific World Shipping Company</p> <ul style="list-style-type: none"> <li>i. 1953</li> <li>ii. Leased a portion of OU2 for unknown purposes</li> <li>iii. Polk City Directories</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>32. Port of Cascade Locks</p> <ul style="list-style-type: none"> <li>i. 1992 to 1997</li> <li>ii. Leased Berth 103 for moorage space for sternwheeler, used a portion of Warehouse 103 for offices, and yard area for parking trailers</li> <li>iii. Port lease files</li> </ul>	

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EPA Question	Response	Reference
	<p>iv. No documented evidence of releases was identified.</p> <p>33. Portland Stevedoring Company</p> <p>i. 1931 to 1933</p> <p>ii. Warehousing</p> <p>iii. RI Report (BBL/Ash Creek/Newfields, 2005)</p> <p>iv. No documented evidence of releases was identified.</p> <p>34. Sassoon-Scherman Fibers Company</p> <p>i. 1978</p> <p>ii. Used warehouse space for storage</p> <p>iii. Port lease files</p> <p>iv. No documented evidence of releases was identified.</p> <p>35. (b) (6)</p> <p>i. 1949</p> <p>ii. Leased a portion of OU2 for unknown purposes</p> <p>iii. Polk City Directories</p> <p>iv. No documented evidence of releases was identified.</p> <p>36. Shipmaster's Assistants Association</p> <p>i. 1965</p> <p>ii. Leased a portion of OU2 for unknown purposes</p> <p>iii. Phase I ESA (Hahn, 2002), Polk City Directories</p> <p>iv. No documented evidence of releases was identified.</p> <p>37. Standard Steel Companies</p> <p>i. 1978 to 1982</p> <p>ii. Used Warehouse 4 at OU2 for storage and distribution of steel</p> <p>iii. Phase I ESA (Hahn, 2002), Port lease records</p> <p>iv. No documented evidence of releases was identified.</p> <p>38. Tri-Star Transload, Inc.</p> <p>i. 1999 to 2000</p> <p>ii. Leased a portion of Warehouse 103 for storage of lumber and wood products handled in connection with their loading/unloading operations at the adjacent Terminal 1 South property.</p> <p>iii. Port lease files</p> <p>iv. No documented evidence of releases was identified.</p> <p>39. Union Fuel Company</p> <p>i. 1917 to 1930</p> <p>ii. Retail fuel wood dealer at OU2.</p> <p>iii. RI Report (BBL/Ash Creek/Newfields, 2005), Polk City Directories</p> <p>iv. No documented evidence of releases was identified.</p> <p>40. U.S. Customs</p> <p>i. 1960 to 1970</p> <p>ii. Used Warehouse Nos. 101 and 103 at OU1 for dock inspection offices</p> <p>iii. Phase I ESA (Hahn, 2002), Polk City Directories</p> <p>iv. No documented evidence of releases was identified.</p> <p>41. U.S. Naval Reserve</p>	

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EPA Question	Response	Reference
	<ul style="list-style-type: none"> <li>i. 1930</li> <li>ii. Dock for U.S. Eagle Boat No. 38.</li> <li>iii. RI Report (BBL/Ash Creek/Newfields, 2005), Polk City Directories</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>42. Waterman Corporation</p> <ul style="list-style-type: none"> <li>i. 1957</li> <li>ii. Leased Warehouse No. 3 at OU1 for unknown purposes</li> <li>iii. Polk City Directories</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>43. West Coast Paper Company</p> <ul style="list-style-type: none"> <li>i. 1999 to 2000</li> <li>ii. Leased a portion of Warehouses 101 and 103 for storage of paper products</li> <li>iii. Port lease files</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>44. Western International Forest Products (dba Bear Springs Forest Products)</p> <ul style="list-style-type: none"> <li>i. 1984 to 2004</li> <li>ii. Used Warehouse 4 at OU2 for warehousing, distribution and manufacturing of lumber and related products. Bear Springs reportedly had areas designated for painting and maintenance. The painting area was used for marking the ends of the lumber with latex paint prior to distribution. In addition to 5-gallon containers of latex paint, paint thinner and a retail size can of spray paint were observed. Rinse water from painting was placed into a 55-gallon drum and was disposed of monthly. The maintenance area was related to general maintenance of forklifts and cutting machines. Bear Springs stored small amounts of hydraulic oil, transmission fluid, gear oil, antifreeze, chainsaw gas, brake cleaner, and motor oil for its equipment and disposed of used oil in a 55-gallon drum that was periodically taken off-site for disposal. Lastly, Bear Springs had a parts cleaner and stored used solvent in sealed 5-gallon containers that were periodically disposed of by a licensed waste hauler.</li> <li>iii. Port lease files</li> <li>iv. During the preparation of a Phase I ESA for the Bear Springs leasehold in 1996, surface staining from dried paint was observed in the southern portion of the warehouse and on the asphalt outside the south corner of the building. Minor staining around the used oil drum was also observed. A subsurface investigation was conducted following the Phase I ESA and is discussed in response to Question 71. See documentation at Tab 5.</li> </ul> <p>45. Western Transportation</p> <ul style="list-style-type: none"> <li>i. 1986 to 1998</li> <li>ii. Leased OU1, including Warehouses 3, 101, and 103 along with Berths 101, 1052 and 103 and outside storage areas for freight interchange, public warehousing, and distribution of products delivered to barges, rail and trucks.</li> <li>iii. Port lease files</li> <li>iv. No documented evidence of releases was identified.</li> </ul> <p>It should be noted that the reference documents identify additional parties that have not been included in the list above. Further scrutiny of these entities for this 104(e) response revealed their operations were connected with addresses and locations that are not associated with the Terminal 1 North Property.</p>	

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EPA Question	Response	Reference
12. If not included in response to any of the previous questions, please describe the purpose and duration of each aquatic lands lease Respondent or the operator of Respondent's Property(ies) ever obtained from the State of Oregon and provide a copy of each application for and aquatic lands lease obtained.	According to the Phase I ESA (Hahn, 2002), the Port of Cascade Locks may have entered into a lease with DSL for the moorage of its sternwheelers at Berth 103 in 1993. The Port was unable to locate a copy of any lease or any other records that confirmed this was the case.	See property transaction records at Tab 5, specifically:  Hahn and Associates, Inc. 2002. <i>A Phase I Environmental Site Assessment, Terminal 1 North, 2210, 2303, 2400, 2440, and 2500 NW Front Avenue, Portland, Oregon.</i> September 12, 2002.
<b>Section 3.0 - Description of Each Property</b>		
13. Provide the following information about each Property identified in response to Question 4:	See response to bullets (a) through (m) below.	
a. property boundaries, including a written legal description;	<p>The City of Portland property (OU1) currently consists of approximately 15.8 acres and is bounded by Slip No. 2 to the southeast, NW Front Avenue to the southwest, the Sulzer Pumps (US) property to the northwest, and the Willamette River to the northeast.</p> <p>The approximately 2.6-acre OU2, currently owned by Emerson Hardwoods, is bounded by NW Front Avenue to the northeast, the Columbia River Pensioners property to the northwest, railroad tracks to the southwest, and Emerson Hardwoods to the southeast.</p> <p>The legal descriptions of OU1 and OU2 comprising Terminal 1 North are included in the deeds to the City of Portland and to Emerson, respectively, which are located at Tab 2.</p>	<p>See purchase and sale agreements at Tab 1.</p> <p>See deeds at Tab 2.</p>
b. location of underground utilities (telephone, electrical, sewer, water main, etc.);	<p>The Port is not aware of the current utility configurations at the Terminal 1 North property. During the Port's ownership, however, the property was served by the following utilities:</p> <ul style="list-style-type: none"> <li>• City of Portland (water and sanitary sewer)</li> <li>• Portland General Electric (electricity)</li> </ul> <p>According to Port records, a utility tunnel formerly extended beneath Warehouse Nos. 101 and 103.</p> <p>Utility drawings are included at Tab 3. See also Attachment A of the Preliminary Assessment (Port, 2000) and figures contained in the RI Report (Port, 2005).</p> <p>A stormwater characterization and line cleanout was recently completed at Terminal 1 North and the stormwater system was mapped as a part of that effort. An updated stormwater conveyance map will be included in the pending <i>Stormwater Cleanout Results</i> report, which will be copied to EPA upon its submittal to DEQ.</p> <p>See response to Question 6 (d) for utility easement information.</p>	<p>See drawings and maps at Tab 3.</p> <p>See the following reports at Tabs 5 and 6, specifically:</p> <p>Hahn and Associates, Inc. 2002. <i>A Phase I Environmental Site Assessment, Terminal 1 North, 2210, 2303, 2400, 2440, and 2500 NW Front Avenue, Portland, Oregon.</i> September 12, 2002.</p> <p>Port of Portland. 2000. <i>Preliminary Assessment, Port of Portland, Terminal 1, 2200 NW Front Avenue, Portland, Oregon 97209.</i> September 18, 2000.</p> <p>BBL/Ash Creek Associates/Newfields. 2005.</p>

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EPA Question	Response	Reference
		<p><i>Terminal 1 Upland Facility Remedial Investigation.</i> September 30, 2005.</p> <p>Ash Creek Associates/Newfields. 2008. <i>Storm Water System Cleanout Work Plan, Terminal 1 North Upland Facility.</i> May 2008.</p>
c. location of all underground pipelines whether or not owned, controlled or operated by you;	Underground pipelines associated with water lines, sanitary and storm systems are described in response to Question 13 (b) above. Any abandoned pipelines associated with former USTs at the property are included in response to Question 13 (j) below.	
d. surface structures (e.g., buildings, tanks, pipelines, etc.);	<p>The existing structures at the City of Portland property (OU1) include Warehouse No. 101, Warehouse No. 103, Warehouse No. 3, guard station, one small two-story building, a water valve shelter, two mobile trailers, and surrounding trailer storage and truck parking areas. The Emerson Hardwoods property (OU2) is comprised of paved parking and a warehouse (formerly known as Warehouse No. 4).</p> <p>It should be noted that prior to the Port's acquisition of the Terminal 1 North property in 1971, the City CPD used a different numbering scheme for the buildings. The following summarizes what each warehouse was formerly called.</p> <ul style="list-style-type: none"> <li>• Warehouse 101 – formerly referred to as House No. 8.</li> <li>• Former Warehouse No. 102 – erroneously referred to in the Hahn report as Warehouse 2, this was called House No. 7.</li> <li>• Warehouse No. 3 – designation did not change</li> <li>• Warehouse No. 103 – formerly referred to as House No. 6</li> <li>• Warehouse No. 4 – did not appear to change, although sometimes referred to as the Transit Warehouse</li> </ul>	<p>See drawings at Tab 3.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation.</i> September 30, 2005.</p>
e. over-water structures (e.g., piers, docks, cranes, etc.);	<p>The eastern and southern portions of OU1 are situated on a dock supported by wooden piers. Portions of Warehouse No. 101 and 103 are constructed over the dock. The remainder of the dock areas are paved and used for parking, or are vacant and enclosed by chain-link fencing. OU1 includes three inactive Willamette River Berths, two (Berths 101 and 102) along the Willamette River, and a third (Berth 103) within Slip No. 2.</p> <p>It should be noted that prior to the Port's acquisition of the Terminal 1 North property in 1971, the City CPD used a different numbering scheme for the berths. The following summarizes what each berth was formerly called.</p> <ul style="list-style-type: none"> <li>• Berth 101 – formerly known as Berth 8</li> <li>• Berth 102 – formerly known as Berth 7</li> <li>• Berth 103 – formerly known as Berth 6</li> </ul> <p>OU2 is west of Front Avenue and does not have any over-water structures.</p>	<p>See drawings at Tab 3.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation.</i> September 30, 2005.</p>
f. dry wells;	No known drywells existed historically at the Terminal 1 North property.	

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EPA Question	Response	Reference
g. treatment or control devices (e.g., surface water, air, groundwater, Resource Conservation and Recovery Act (RCRA), Transfer, Storage, or Disposal (TSD), etc.);	No historical records were identified that indicate treatment or control devices on the Facility.	
h. groundwater wells, including drilling logs;	<p>On July 24, 25, and 26, 2002, a groundwater monitoring well network consisting of seven wells (MW-1 through MW-7) was installed at the property (Hahn, 2002). Drilling logs for these wells are in Appendix A of the Monitoring Well Installation and Groundwater Sampling Report (Hahn, 2002).</p> <p>On December 2 and 3, 2003, three groundwater wells (MW-8 through MW-10) were installed as part of the Remedial Investigation. Drilling logs for these wells are in Appendix B of the Terminal 1 North Upland Facility, Remedial Investigation report (BBL/ACA/Newfields, 2005).</p>	<p>See site investigation records at Tab 6, specifically:</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation</i>. September 30, 2005.</p> <p>Hahn and Associates, Inc. 2002. <i>Monitoring Well Installation and Groundwater Sampling Report, Port of Portland, Terminal 1 North, 2500 NW Front Avenue, Portland, Oregon</i>. October 25, 2002.</p>
i. storm water drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied and maintained;	<p><b><u>Stormwater</u></b></p> <p>During the Port's ownership of OU1, the stormwater system included a series of catch basins, three exterior trench drains, and one interior trench drain (at Warehouse 101). In addition, there were a number of dock drains (drainage points without catch basins or piping) that drained through the berths. All of the stormwater catch basins that were on OU1, except one catch basin along NW Front Avenue, connected to outfalls that discharged to the Willamette River. Seven outfalls (designated WR-228 through WR-234) were located in the pier area beneath the dock and ranged from approximately 5 to 15 inches in diameter. The OU1 catch basin along NW Front Avenue was connected to the City of Portland's municipal storm sewer system.</p> <p>Since the transfer to the City in 2004, the Port has learned that outfalls WR-229 and WR-233 have been abandoned. Outfall WR-229 is a crushed pipe and WR-233 has been plugged.</p> <p>Prior to the sale to the City, stormwater discharges from OU1 were permitted under the Port's Municipal Separate Storm Sewer (MS4) Permit No. 101314, issued September 7th, 1995. The Port implemented this permit through BMPs in coordination with the Port's co-permittees (the City and Multnomah County) through Intergovernmental Agreements (IGAs), and as outlined in their Storm Water Management Plan and reported on in annual compliance reports submitted to DEQ.</p> <p>During the Port's ownership of OU2, the stormwater system included five catch basins that were connected to the City of Portland's municipal storm sewer system. Prior to the sale to Emerson, stormwater on the OU2 property was managed under MS4 Permit 101314.</p> <p>A Storm Water System Cleanout Work Plan (2008) was prepared and has been implemented pursuant to the VCP Agreement and is in response to a March 5, 2008 letter from DEQ to the Port and City requiring stormwater characterization. This Work Plan presents the proposed methodology to clean the storm water system and document completion of the cleanout. The report of results and updated conveyance line map are in</p>	<p>See drawings and maps at Tab 3.</p> <p>See property transaction records at Tab 5, specifically:</p> <p>GeoEngineers. 1996. <i>Environmental Review Update, Terminal 1-Western Transportation Facility, 2200 NW Front Avenue, Portland, Oregon</i>. June 4, 1996.</p> <p>Hahn and Associates, Inc. 2002. <i>A Phase I Environmental Site Assessment, Terminal 1 North, 2210, 2303, 2400, 2440, and 2500 NW Front Avenue, Portland, Oregon</i>. September 12, 2002.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>Ash Creek Associates/Newfields. 2008. <i>Storm Water System Cleanout Work Plan, Terminal 1 North Upland Facility</i>. May 2008.</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation</i>. September 30, 2005.</p>

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EPA Question	Response	Reference
	<p>preparation and a copy will be submitted to EPA when the report is submitted to DEQ.</p> <p><b><u>Sanitary</u></b>  Prior to the transfer to the City in 2004, a sewer lift station is located in the central portion of OU1. The lift station pumps sewage from Warehouse No. 101, from an area of slightly lower elevation, to a sewer main located in NW Front Avenue.</p> <p>Plumbing permits indicated that a sump, connected to the sanitary sewer system, was historically located on the southern exterior of Warehouse No. 4 at OU2; however, there was no indication of a sump at this location during the Phase I ESA (Hahn 2002).</p> <p>A septic system was historically associated with Warehouse No. 101 (formerly known as House 8) that was removed in 1962. City CPD drawings indicate sanitary sewer line connections for what are now known as Warehouses 101, 102 and 103 were made in 1969.</p> <p>City sewers serving other properties and an abandoned City sewer traverse OU1.</p>	<p>See MS4 permit information in Tab 13 of the Port's 104(e) response for Terminal 5, submitted to EPA and dated May 16, 2008.</p>
<p>j. subsurface disposal field(s), Underground Injection Control (UIC) wells, and other underground structures (e.g., underground storage tanks (USTs); and where they are located, if they are still used, and how they were closed; including, but not limited to, the tanks associated with the St. Johns Auto Wrecking Yard;</p>	<p>Historically, two Underground Storage Tanks (USTs) are known to have been located on the Terminal 1 North property. A summary of tank operation and removal follows.</p> <p>UST 1 was located immediately adjacent to the southeast side of Warehouse No. 101. The UST was a 675-gallon heating oil tank installed during the construction of Warehouse No. 101 in 1955. UST 1 was removed in December 1997. Confirmation samples of the soil collected from the UST excavation area indicated that soil beneath the southeast wall of Warehouse No. 101 contained diesel and heavier hydrocarbons, but concentrations of polynuclear aromatic hydrocarbons (PAHs) and benzene, toluene, ethylbenzene, and xylenes (BTEX) in soil were below DEQ risk-based screening levels. On March 19, 1998, DEQ issued a No Further Action (NFA) determination for UST 1.</p> <p>UST 2 was located north of Warehouse No. 103. The UST was a 680-gallon heating oil tank installed during the construction of Warehouse No. 102 in 1953-54 and was used to fuel an oil-fired boiler for the warehouse. UST 2 was removed in December 1997. During the removal, UST 2 was observed to be in good condition with no indications of leakage. Petroleum hydrocarbons were not detected in confirmation soil samples from the UST excavation, confirming that no release had occurred from the UST.</p> <p>In addition, a 680-gallon UST was suspected to have been present at a former restroom building northeast of Warehouse No. 3. A geophysical survey at the location of the suspected UST, however, found no evidence of a UST. Two soil borings were installed downgradient of the suspect location. Oil-range hydrocarbons, PAHs, and volatile organic compounds (VOCs) were detected in soil samples from these borings at generally low concentrations.</p>	<p>See property transaction records at Tab 5, specifically:</p> <p>Hahn &amp; Associates, Inc. 2002. <i>A Phase I Environmental Site Assessment, Terminal 1 North, 2210, 2303, 2400, 2440, and 2500 NW Front Avenue, Portland, Oregon</i>. September 12, 2002.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>Hart Crowser. 1998. <i>Underground Storage Tank Decommissioning Report, Port of Portland-Terminal 1, Portland, Oregon</i>. March 11, 1998.</p> <p>Hart Crowser. 1998b. <i>Memorandum Re: Heating Oil UST Decommissioning, Port of Portland – Terminal 1</i>. March 13, 1998.</p> <p>Century West Engineering Corporation (Century West). 1995. <i>Port of Portland Tank Management Manual, Marine Terminals Part 1 Site Assessments</i>.</p>



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EPA Question	Response	Reference
<p>k. any and all major additions, demolitions or changes on, under or about the Property, its physical structures or to the Property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;</p>	<p>The Terminal 1 North property underwent a reconfiguration following the City CPD's acquisition in 1946, which included the demolition of the structures associated with the former Eastern &amp; Western Lumber facility. Between 1946 and 1971, the City CPD made the following modifications to the property:</p> <ul style="list-style-type: none"> <li>• Between 1948 and 1955, an automotive repair garage was constructed to the southeast of Warehouse No. 4.</li> <li>• 1949 - Reconstructed OU1 at Terminal 1 North as a 22-acre lumber assembly facility with direct rail-to-ship loading capability. The facility was built-out with three berths (101, 102 and 103).</li> <li>• 1952 - Warehouse No. 4 (also known as the Transit Warehouse) constructed at OU2.</li> <li>• 1953-1954 – Constructed former Warehouse No. 102</li> <li>• 1955 – Constructed Warehouse 101 at OU1.</li> <li>• 1957 – Constructed Warehouse 103 at OU1.</li> <li>• 1959 – Removed or demolished automotive repair garage at OU2.</li> <li>• 1960 – Constructed Warehouse No. 3 at OU1.</li> </ul> <p>During the Port's subsequent ownership between 1971 and 2004, the following modifications were completed at the property:</p> <ul style="list-style-type: none"> <li>• 1979 - Guard station constructed at OU1 and Warehouse No. 102 razed.</li> <li>• The May Trucking Company office was located north of Warehouse No. 103 and was part of the Former Warehouse No. 102. This structure was removed by 2001;</li> <li>• Two small office/lunchroom/restroom-type structures were located east of Warehouse No. 3 (removal date unknown); and</li> <li>• A temporary booking facility for the Multnomah County Sheriff was constructed in 2001, located west of Warehouse No. 103, adjacent to NW Front Avenue. This facility was removed in 2003.</li> </ul>	<p>See site investigation records at Tab 6, specifically:</p> <p>Port of Portland. 2000. <i>Preliminary Assessment, Port of Portland, Terminal 1, 2200 NW Front Avenue, Portland, Oregon</i> 97209. September 18, 2000.</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation</i>. September 30, 2005.</p>
<p>l. all maps and drawings of the Property in your possession; and</p>	<p>Maps and drawings identified relevant to the Terminal 1 North property are included at Tab 3 and in the records referenced in the next column at right.</p>	<p>See drawings and maps at Tab 3.</p> <p>See property transaction records at Tab 5, specifically:</p> <p>Hahn &amp; Associates, Inc. 2002. <i>A Phase I Environmental Site Assessment, Terminal 1 North, 2210, 2303, 2400, 2440, and 2500 NW Front Avenue, Portland, Oregon</i>. September 12, 2002.</p> <p>Hahn &amp; Associates, Inc. 2004. <i>A Phase I Environmental Site Assessment, Approximate 0.3-Acre Property, 2435 NW Front Avenue, Portland, Oregon</i>. January 20, 2004.</p>

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EPA Question	Response	Reference
		<p>GeoEngineers. 1996. <i>Environmental Review Update, Terminal One-Western Transportation Facility, 2200 NW Front Avenue, Portland, Oregon.</i> June 4, 1996.</p> <p>GeoEngineers. 1996. <i>Report of Phase I Environmental Site Assessment, Bear Springs Lumber Distribution Facility, 2303 Northwest Front Avenue, Portland, Oregon.</i> August 27, 1996.</p> <p>EMCON. 1998. <i>Phase One Environmental Site Assessment, 220 NW Front Avenue, Portland, Oregon.</i> July 13, 1998.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>Hart Crowser. 1998. <i>Underground Storage Tank Decommissioning Report, Port of Portland-Terminal 1, Portland, Oregon.</i> March 11, 1998.</p> <p>Port of Portland. 2000. <i>Preliminary Assessment, Port of Portland, Terminal 1, 2200 NW Front Avenue, Portland, Oregon 97209.</i> September 18, 2000.</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation.</i> September 30, 2005.</p> <p>Hahn &amp; Associates, Inc. 2002. <i>Pre-Remedial Investigation Assessment, Terminal 1 North, 2500 NW Front Avenue, Portland, Oregon.</i> October 14, 2002.</p> <p>Hahn &amp; Associates, Inc. 2002. <i>Monitoring Well Installation and Groundwater Sampling Report, Port of Portland, Terminal 1 North, 2500 NW Front Avenue, Portland, Oregon.</i> October 25, 2002.</p> <p>Hahn &amp; Associates, Inc. 2003. <i>Groundwater</i></p>

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EPA Question	Response	Reference
		<p><i>Monitoring Report, Port of Portland, Terminal 1 North, 2500 NW Front Avenue, Portland, Oregon. March 14, 2003.</i></p> <p><i>URS Corp. 2003. Draft Sampling and Analysis Plan for Remedial Investigation, Terminal 1 North Upland Facility, Port of Portland. November 2003.</i></p> <p><i>Hahn &amp; Associates, Inc. 2002. Work Plan for Site Investigation, Terminal 1 North, 2200 NW Front Avenue, Portland, Oregon. April 29, 2002.</i></p> <p><i>Hahn &amp; Associates, Inc. 2002. Work Plan (Addendum No.1) for Monitoring Well Installation and Sampling, Port of Portland, Terminal 1 North, 2500 NW Front Avenue, Portland, Oregon. July 19, 2002.</i></p> <p><i>URS Corp. 2004. Final Sampling and Analysis Plan for Remedial Investigation, Terminal 1 North Upland Facility, Port of Portland. February 2004.</i></p> <p><i>URS Corp. 2004. Final Project Management Plan for Remedial Investigation/Feasibility Study, Port of Portland, Terminal 1 North. February 2004.</i></p> <p><i>URS Corp. 2004. Final Work Plan for Remedial Investigation, Terminal 1 North Upland Facility, Port of Portland. February 2004.</i></p> <p><i>Oregon DEQ. 2001. Letter to Pad Quinn, Re: Terminal 1 Preliminary Assessment, 2200 NW Front Avenue, Portland, Oregon. Portland Harbor Marine Terminal Sites. May 18, 2001.</i></p>
m. all aerial photographs of the Property in your possession.	Aerial photographs identified relevant to the Terminal 1 North property are included at Tab 4 and in the records referenced in the next column at right.	<p>See aerial photographs at Tab 4.</p> <p>See property transaction records at Tab 5, specifically:</p>

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EPA Question	Response	Reference
		<p>EMCON. 1998. <i>Phase One Environmental Site Assessment, 220 NW Front Avenue, Portland, Oregon.</i> July 13, 1998.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>Port of Portland. 2000. <i>Preliminary Assessment, Port of Portland, Terminal 1, 2200 NW Front Avenue, Portland, Oregon 97209.</i> September 18, 2000.</p>
14. For Properties adjacent to the Willamette River, provide specific information describing the river-ward boundary of private ownership and where state aquatic lands and/or state-management jurisdiction begins. Provide a map that delineates the river-ward boundary of each Property.	OUI's property boundary is the line of ordinary high water. The property boundary was resolved by the boundary settlement between the Port and DSL of November 1987. The settlement contains a figure depicting the line of ordinary high water.	<p>See agreements at Tab 1.</p> <p>See deeds at Tab 2.</p>
15. For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.	See records at Tab 5 and Tab 6.	<p>See property transaction records at Tab 5.</p> <p>See site investigation records at Tab 6.</p>
16. Identify all past and present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on each Property. For each such unit or area, provide the following information:	Not applicable during the Port's ownership from 1971-2004.	
<ul style="list-style-type: none"> <li>a. a map showing the unit/area's boundaries and the location of all known units/areas whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units/areas;</li> <li>b. dated aerial photograph of the site showing each unit/area;</li> <li>c. the type of unit/area (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit/area;</li> <li>d. the dates that the unit/area was in use;</li> <li>e. the purpose and past usage (e.g., storage, spill containment, etc.);</li> <li>f. the quantity and types of materials (hazardous substances and any other chemicals) located in each unit/area and;</li> <li>g. the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area.</li> </ul>		

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EPA Question	Response	Reference
17. If the unit/area described above is no longer in use, how was such unit/area closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit/area.	Not applicable.	
18. For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River:	<p>The City of Portland is the current owner of OU1 and Emerson Hardwoods is the current owner of OU2.</p> <p>Historical sanitary and storm sewer information is contained in response to Questions 13 (b) and 13 (i).</p>	<p>See drawings and maps at Tab 3.</p> <p>See property transaction records at Tab 5, specifically:</p> <p>Hahn and Associates, Inc. 2002. <i>A Phase I Environmental Site Assessment, Terminal 1 North, 2210, 2303, 2400, 2440, and 2500 NW Front Avenue, Portland, Oregon.</i> September 12, 2002.</p> <p>GeoEngineers. 1996. <i>Environmental Review Update, Terminal 1-Western Transportation Facility, 2200 NW Front Avenue, Portland, Oregon.</i> June 4, 1996.</p> <p>Hahn and Associates, Inc. 2002. <i>A Phase I Environmental Site Assessment, Terminal 1 North, 2210, 2303, 2400, 2440, and 2500 NW Front Avenue, Portland, Oregon.</i> September 12, 2002.</p> <p>See site investigation records Tab 6, specifically:</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation.</i> September 30, 2005.</p> <p>Port of Portland. 2000. <i>Preliminary Assessment, Port of Portland, Terminal 1, 2200 NW Front Avenue, Portland, Oregon 97209.</i> September 18, 2000.</p> <p>Ash Creek Associates/Newfields. 2008. <i>Storm Water System Cleanout Work Plan, Terminal 1 North Upland Facility.</i> May 2008.</p> <p>See MS4 permit information in Tab 13 of the Port's 104(e) response for Terminal 5, submitted</p>

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EPA Question	Response	Reference
		to EPA and dated May 16, 2008.
a. the location and nature of each sewer line, drain, ditch, or tributary;	<p>A general description of the stormwater systems present at the Terminal 1 North property is provided in response to Question 13 (i) above.</p> <p>An updated conveyance line map is currently in preparation and will be included in the results report from the <i>Storm Water System Cleanout Work Plan</i>.</p>	See site investigation records at Tab 6.
b. the date of construction of each sewer line, drain, ditch, or tributary;	Unknown.	
c. whether each sewer line, or drain was ever connected to a main trunk line	The sanitary sewer lines connect to a main trunk line located in NW Front Avenue.	See drawings at Tab 3.
d. whether each sewer line, drain, ditch, or tributary drained any hazardous substance, waste, material or other process residue to the Willamette River; and	<p>See relevant reports and documents at Tab 6 regarding activities during City lease of OU1 beginning in 2002.</p> <p>See also response to Question 11.</p>	See site investigation records at Tab 6.
e. any documentation regarding but not limited to the following on any and all outfalls to the Willamette River which are located within the boundaries of the Property(ies). Your response should include, but not be limited to:	See response in sub-bullets (i) through (ii) below.	
i. the areas serviced by the outfalls; and	Unknown.	
ii. the type of outfall (i.e., storm water or single facility operational).	All of the outfalls serving the Terminal 1 North property are dedicated to stormwater.	
19. Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these Properties on stormwater, sheet flow, or surface water runoff. Also provide copies of any Stormwater Pollution Prevention or Maintenance Plans or Spill Plans developed for different operations during the Respondent's operation of each Property.	See relevant reports and documents at Tab 6.	<p>See site investigation records at Tab 6, specifically:</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation</i>. September 30, 2005.</p> <p>Ash Creek Associates/Newfields. 2008. <i>Storm Water System Cleanout Work Plan, Terminal 1 North Upland Facility</i>. May 2008.</p> <p>See MS4 permit information in Tab 13 of the Port's 104(e) response for Terminal 5, submitted to EPA and dated May 16, 2008.</p>
<b>Section 4.0 - Respondent's Operational Activities</b>		



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EPA Question	Response	Reference
<p>20. Describe the nature of your operations or business activities at each Property. If the operation or business activity changed over time, please identify each separate operation or activity, the dates when each operation or activity was started and if applicable, ceased.</p>	<p>After the Port acquired the property in 1971, the Port leased the property to others for their commercial-type operations; primarily for wharfing, storage and distribution of finished products.</p> <p>The Port was the land owner of Terminal 1 North from 1971 to 2004 and acted as property manager for the tenants that leased the warehouses and berths at the property. Activities performed by or contracted by the Port at the Terminal 1 North property included maintaining in good working order limited interior systems (plumbing and sprinklers), exterior structural components (windows, siding, roofs) and general maintenance of pavement and rail leads. The Port also had general maintenance responsibility for the berths (e.g., piling replacement).</p>	<p>See property transaction records at Tab 5, specifically:</p> <p>Hahn &amp; Associates, Inc. 2002. <i>A Phase I Environmental Site Assessment, Terminal 1 North, 2210, 2303, 2400, 2440, and 2500 NW Front Avenue, Portland, Oregon.</i> September 12, 2002.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation.</i> September 30, 2005.</p> <p>Port of Portland. 2000. <i>Preliminary Assessment, Port of Portland, Terminal 1, 2200 NW Front Avenue, Portland, Oregon 97209.</i> September 18, 2000.</p>
<p>21. At each Property, did you ever use, purchase, generate, store, treat, dispose, or otherwise handle any waste, or material? If the answer to the preceding question is anything but an unqualified "no," identify:</p> <ol style="list-style-type: none"> <li>in general terms, the nature and quantity of the waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;</li> <li>the chemical composition, characteristics, physical state (e.g., solid, liquid) of each waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;</li> <li>how each such waste or material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and</li> <li>the quantity of each such waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.</li> </ol>	<p>No.</p>	
<p>22. Describe all activities at each Property that was conducted over, on, or adjacent to, the Willamette River. Include in your description whether the activity involved hazardous substances, waste, or materials and whether any such hazardous substances, waste, or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located in the Willamette River.</p>	<p>When the City CPD owned the Terminal 1 North property, over-water activities included the loading and unloading of lumber, logs, paper products, steel, containers, and bagged grain.</p> <p>Three berths served the OU1 portion of the Terminal 1 North property during the Port's ownership (Berths 101, 102 and 103, respectively). Activities by Port tenants that occurred at the berths were generally limited to wharfing (loading and unloading products across the docks). The Port had general maintenance responsibility</p>	<p>See property transaction records at Tab 5, specifically:</p> <p>GeoEngineers. 1996. <i>Environmental Review Update, Terminal One-Western Transportation Facility, 2200 NW Front Avenue, Portland.</i></p>

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EPA Question	Response	Reference
	<p>for the berths (e.g., piling replacement).</p> <p>During Western Transportation's lease (1986-1998), they periodically fueled barges that docked adjacent to their leasehold. The dispensing of fuel was reportedly accomplished using a hose that ran from trucks directly into the barges.</p> <p>Activities by vessels that called on Terminal 1 North from 1971 to 2004 were governed by the Port's published tariff, approved by the Federal Maritime Commission.</p> <p>Available information from regulatory agencies and limited Port records were reviewed for information on spills and releases. In-water spills have been identified, but available records do not indicate an association with any Port activities at the terminal.</p> <p>Spills related to activities conducted by tenants or users that have been identified include:</p> <ul style="list-style-type: none"> <li>• 12/11/1971 - Oil slick associated with S.S. Loch Loyal observed at Berth 8 (quantity not reported).</li> <li>• 2/8/1971 - Release of oil from S.S. Maas Lloyd at Berth 6 to Willamette River, cleaned up by Shaver (quantity not reported).</li> <li>• 11/2/1971 - Oil slick associated with vessel M/V Maria Carla D'Amico observed; estimated 90 gallons released to Willamette River.</li> <li>• 11/8/1971 - Estimated 3 barrels of Bunker C released to Willamette River by Shaver Transportation fuel barge when a line to the vessel Albia broke (reported by Shaver).</li> <li>• 2/13/1982 - Oil spill observed on the deck of the vessel S.S. El Centro Americano at Berth 103 (quantity not reported); no additional information available.</li> <li>• 5/31/1985 - Oil slick observed at Berth 101; estimated at 100 ft. in length; source reported as either vessel S.S. Maryland or Tug Navigator (quantity not reported).</li> <li>• 10/10/1990 - Material spilled from a hose when Arrow Transportation Company was loading a ship from a truck, approximately 15 gallons of lubricating oil released, approximately 5 gallons reached Willamette River. Spill was cleaned up with sorbent materials.</li> </ul> <p>These environmental conditions in the water near Terminal 1 were also observed:</p> <ul style="list-style-type: none"> <li>• 1968 – Oil slick from release at upstream Zidell facility observed from Terminal 1.</li> <li>• 9/25/1981 – an oil slick was observed emanating from the Fremont Bridge area downstream to Terminal 1 Berths 101 to 106; source reported as upriver (quantity not specified).</li> <li>• 6/24/1997 - Release of unspecified oil reported based on 'unknown sheen sighting', sheen size approximately 100 ft X 100 ft; some rainbow color; caller was aboard SS Beaver State.</li> </ul> <p>From World War II to 1960, Shaver Transportation Company (Shaver) owned and operated a barge service, which included two dedicated sludge barges, the Oneonta and the Occident. Shaver would transport these barges to vessels and other waterfront operators and collect oily bilge water, sludges, wastes and other materials. Shaver subsequently towed the barges and pumped out the materials for disposal at its upland sump site in the Rivergate area of the Harbor. Records produced by Shaver in <i>Oregon Steel Mills v. Port of Portland</i>, Case No. 0201-00718 (Multnomah County Circuit Court) reflect that Shaver Transportation Company collected materials</p>	<p><i>Oregon</i>. June 4, 1996.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation</i>. September 30, 2005.</p> <p>Port of Portland. 2000. <i>Preliminary Assessment, Port of Portland, Terminal 1, 2200 NW Front Avenue, Portland, Oregon 97209</i>. September 18, 2000.</p> <p>See spills and releases information at Tab 7.</p> <p>See tariffs at Tab 8.</p> <p>See Shaver logs at Tab 8.</p>



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EPA Question	Response	Reference
	from the vessel Oregon Mail at the City CPD's Terminal 1 in July 1956. Review of these logs indicates the pickup location corresponds with Berth 101 at the Terminal 1 North property. See documentation at Tab 8.	
23. For each Property at which there was or is a mooring facility, dock, wharf or any over-water structure, provide a summary of over-water activities conducted at the structure, including but not limited to, any material loading and unloading operations associated with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, and ship building, retrofitting, maintenance, and repair.	See response to Question 22 above.  Vessel loading and unloading activities were governed by the Port's regulatory tariff, as amended from time to time.	See tariffs at Tab 8.
24. Describe all activities conducted on leased aquatic lands at each Property. Include in your description whether the activity involved hazardous substances, waste, or materials and whether any such hazardous substances, waste, or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located on such leased aquatic lands.	Not applicable.	
25. Please describe the years of use, purpose, quantity, and duration of any application of pesticides or herbicides on each Property during the period of investigation (1937 to the present). Provide the brand name of all pesticides or herbicides used.	Available records did not indicate the use of pesticides or herbicides at the Terminal 1 North property.	
26. Describe how waste is transported off the Property for disposal and ever were handled, stored, and/or treated prior to transport to the disposal facility.	Not applicable.	
27. Has Respondent ever arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials to any Property (including the Willamette River) within the Investigation Area? If so, please identify every Property that Respondent's materials were disposed or treated at in the Investigation Area. In addition, identify: a. the persons with whom the Respondent made such arrangements; b. every date on which Respondent made such arrangements; c. the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid) and quantity (volume and weight) of all materials involved in each such arrangement; d. in general terms, the nature and quantity of the non-hazardous materials involved in each such arrangement; e. in general terms, the nature and quantity of any hazardous materials involved in each such arrangement; f. the owner of the materials involved in each such arrangement, if	The Port has not located any information indicating that it arranged for disposal or treatment to the Terminal 1 North property.	

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EPA Question	Response	Reference
<p>not Respondent;</p> <p>g. all tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions;</p> <p>h. the address(es) for each Property, precise locations at which each material involved in such transactions actually was disposed or treated;</p> <p>i. the owner or operator of each facility at which hazardous or non-hazardous materials were arranged to be disposed at within the Investigation Area;</p> <p>j. who selected the location to which the materials were to be disposed or treated;</p> <p>k. who selected the Property as the location at which hazardous materials were to be disposed or treated; and</p> <p>l. any records of such arrangement and each shipment.</p>		
<p>28. Describe the plants and other buildings or structures where Respondent carried out its operations at each Property within the Investigation Area (excluding locations where ONLY clerical/office work was performed).</p>	<p>The Port was the lessor of the property, see response to Question 20. Occupants and contents of the structures have changed over time, but can be generally summarized as follows:</p> <p><b>OU1:</b>  <b>Warehouse No. 3 (2500 NW Front Avenue).</b> The approximate 96,000 square foot Warehouse No. 3 consists of a wooden structure with metal siding and a wooden roof on an asphalt and concrete foundation. In 2002 (prior to the City's occupation of the property), the structure was used for window assembly at the property, including frame building, glazing, and packaging for shipment. In 2002, the City leased OU1, including Warehouse Nos. 3, 101, 103, common areas, and the dock from the Port for construction of the West Side Big Pipe tunnel. See the response to Question 11 for other historical occupants and uses. See City of Portland 104(e) response for documentation regarding use after 2002.</p> <p><b>Warehouse No. 101 (2400 NW Front Avenue).</b> The approximate 67,220 square-foot Warehouse No. 101 consists of a wooden structure with metal siding and a wooden roof on an asphalt foundation. In 2002 (prior to the City's occupation of the property), the structure was used primarily for raw materials storage. See the response to Question 11 for other historical occupants and uses. See City of Portland 104(e) response for documentation regarding use after 2002.</p> <p><b>Warehouse No. 103 (2210 NW Front Avenue).</b> The approximate 61,776 square-foot Warehouse No. 103 consisted of a wooden structure with metal siding and a wooden roof on an asphalt and concrete foundation. The structure was used for the storage of stone and finished goods. See the Response to Question 11 for other historical uses conducted during the Port's ownership and management of site leases. See City of Portland 104(e) response for documentation regarding use after 2002.</p> <p><b>OU2:</b>  <b>Warehouse No. 4 (2303 NW Front Avenue).</b> OU2 is developed with an approximate 54,000-square foot concrete building (Warehouse No. 4) on a concrete slab foundation with a wooden roof. The property has been used as a lumber cutting, grading, sorting, packaging, warehousing, and distribution facility. The eastern portion of the building was occupied by administrative offices, a mezzanine lunchroom and electrical room, and a</p>	<p>See property transaction records at Tab 5, specifically:</p> <p>Hahn &amp; Associates, Inc. 2002. <i>A Phase I Environmental Site Assessment, Terminal 1 North, 2210, 2303, 2400, 2440, and 2500 NW Front Avenue, Portland, Oregon.</i> September 12, 2002.</p>

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	mechanical maintenance shop. The remainder of OU2 was historically occupied by lumber cutting, lumber end painting, sorting, and packaging equipment, an overhead pneumatic sawdust collection system, and warehouse storage. Wood treatment, drying, varnishing, or finishing activities were not performed at the building. Paved parking areas, loading, and drop-off areas were located on the southeastern and northwestern sides of the building. These areas also included packaged and bundled lumber storage and equipment storage.	
29. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations on each Property.	Not applicable. The Port did not conduct any activities at the Terminal 1 North property that could be or were depicted in a schematic diagram.	
30. Provide a brief description of the nature of Respondent's operations at each location on each Property including: a. the date such operations commenced and concluded; and b. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.	<p>The Port was the land owner of Terminal 1 North from 1971 to 2004 and acted as property manager for the tenants that leased the warehouses and berths at the property. Activities performed by or contracted by the Port at the Terminal 1 North property included maintaining in good working order limited interior systems (plumbing and sprinklers), exterior structural components (windows, siding, roofs) and general maintenance of pavement and rail leads. The Port also had general maintenance responsibility for the berths (e.g., piling replacement).</p> <p>See also response to Questions 11 and 28.</p>	<p>See property transaction records at Tab 5, specifically:</p> <p>Hahn &amp; Associates, Inc. 2002. <i>A Phase I Environmental Site Assessment, Terminal 1 North, 2210, 2303, 2400, 2440, and 2500 NW Front Avenue, Portland, Oregon.</i> September 12, 2002.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation.</i> September 30, 2005.</p>
31. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.	<p>As described above in response to Question 11, the Port leased the property for commercial-type operations, mainly associated with lumber and related products. Lumber wharfing activities declined over the years.</p> <p>See also response to Question 30.</p>	
32. List the types of raw materials used in Respondent's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.	Not applicable.	
33. Provide copies of Material Safety Data Sheets (MSDS) for materials used in the Respondent's operations.	Not applicable.	
34. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to: a. the types of materials used to clean/maintain this	Available records did not indicate cleaning and maintenance of equipment or machinery at the property by the Port.	

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EPA Question	Response	Reference
<p>equipment/machinery;</p> <p>b. the monthly or annual quantity of each such material used.</p> <p>c. the types of materials spilled in Respondent's operations;</p> <p>d. the materials used to clean up those spills;</p> <p>e. the methods used to clean up those spills; and</p> <p>f. where the materials used to clean up those spills were disposed of.</p>		
35. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation.	Not applicable. Port activities were limited as the land owner. See response to Question 20.	
36. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:	Not applicable.	
<p>a. its physical state;</p> <p>b. its nature and chemical composition;</p> <p>c. its color;</p> <p>d. its odor.</p> <p>e. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and</p> <p>f. the dates (beginning &amp; ending) during which each type of waste was produced by Respondent's operations.</p>		
37. Provide a schematic diagram that indicates which pan of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.	Not applicable. The Port did not conduct any activities that could be or were depicted in a schematic diagram.	
38. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.	<p>The Port is the former owner of the Terminal 1 North property. However, the following current employees have responsibility for the Port's environmental matters include:</p> <ul style="list-style-type: none"> <li>• David Breen, Environmental Project Manager II</li> <li>• Sebastian Degens – Marine Planning &amp; Development Manager</li> <li>• Jennifer Fonseca-Littrell – Environmental Specialist I</li> <li>• Marla Harrison – Operations Environmental Safety Manager I</li> <li>• Nicole LaFranchise, Environmental Project Manager III</li> <li>• Sam Ruda, Director of Marine &amp; Industrial Development</li> </ul> <p>Former employees who have had responsibility for the Port's environmental matters include:</p> <ul style="list-style-type: none"> <li>• John Childs, Environmental Project Manager II (1997-2003)</li> <li>• Katherine Futornick, Corporate Environmental Manager (1994-1999)</li> <li>• Danil Hancock, Waterway Resources Manager (1988-1994)</li> <li>• Russell Korvola, Environmental Services Manager (1988-1995)</li> <li>• Cheryl Koshuta, Chief Environmental Officer (1999-2007)</li> </ul>	

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EPA Question	Response	Reference
	<ul style="list-style-type: none"> <li>• Roland Montagne, Environmental External Affairs Manager (1986-1999)</li> <li>• Padraic Quinn, Environmental Project Manager II (1993-2002)</li> <li>• Denise Ragland, Marine Superintendent II (1967-2003)</li> <li>• Anne Summers, Environmental Project Manager III (2001-2008)</li> </ul>	
39. For each type of waste describe Respondent's contracts, agreements or other arrangements for its disposal, treatment, or recycling.	Not applicable.	
40. Provide copies of such contracts and other documents reflecting such agreements or arrangements: a. state where Respondent sent each type of its waste for disposal, treatment, or recycling; b. identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request); c. if Respondent transported any of its wastes away from its operations, please so indicate; d. for each type of waste specify which Waste Carrier picked it up; e. indicate the ultimate disposal/recycling/treatment location for each type of waste. f. provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste; and g. state the basis for and provide any documents supporting the answer to the previous question.	Not applicable.	
41. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to: a. the nature and chemical composition of each type of waste; b. the dates on which those wastes were disposed; c. the approximate quantity of those wastes disposed by month and year; d. the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre-treatment plant, Publicly Owned Treatment Works (POTW), etc.); and e. whether and what pretreatment was provided.	Based on available records, there is no indication of wastes being disposed into drains at the Terminal 1 North property.	
42. Identify any sewage authority or treatment works to which Respondent's waste was sent.	The Port is not aware of any waste materials sent to the sewage authority or treatment works (i.e., City of Portland POTW).	
43. Describe all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's	No records have been located that identify installation or use of a wastewater treatment system for any Port activities at the Terminal 1 North property.	



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EPA Question	Response	Reference
operations.		
44. If applicable, describe the facilities, processes and methods Respondent or Respondent's contractor used, and activities engaged in, either currently or in the past, related to ship building, retrofitting, maintenance or repair, including, but not limited to, dry-docking operations, tank cleaning, painting and re-powering.	To the Port's knowledge, the Terminal 1 North property has not been used for activities related to shipbuilding, ship maintenance or repair.	
45. Describe any hazardous substances, wastes, or materials used or generated by the activities described in response to the previous Question and how these hazardous substances, materials and wastes were released or disposed of.	Not applicable.	
46. Provide copies of any records you have in your possession, custody or control relative to the activities described in response to the previous two Questions.	Not applicable.	
47. Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids.	<p>During the Port's ownership of the Terminal 1 North property, the following PCB-equipment was identified:</p> <ul style="list-style-type: none"> <li>• In 1990, a sample from fluorescent light ballast (FLB) in Warehouse 101 indicated low levels of PCBs. The FLB was removed and disposed of, although the disposal location was not reported.</li> <li>• In 1991, a 25 KVA PCB-transformer was removed by Electrical Construction Company from an unspecified location at Terminal 1 (not known whether from the North or South terminal) and transported to GE's transformer decommissioning facility in Portland, Oregon.</li> </ul>	See PCB records at Tab 7.
48. For each process or activity identified in response to the previous Question, describe the dates and duration of the activity or process and the quantity and type of PCB(s) or PCB(s) containing materials or liquids.	Unknown.	
49. For each process or activity identified in response to the previous two Questions, identify the location of the process or activity on the Property.	Not applicable.	
<b>Section 5.0 - Regulatory Information</b>		
50. Identify all federal, state and local authorities that regulated the owner or operator of each Property and/or that interacted with the owner or operator of each Property. Your response is to address all interactions and in particular all contacts from agencies/departments that dealt with health and safety issues and environmental concerns.	<p>Environmental regulators/authorities include:</p> <ul style="list-style-type: none"> <li>• Federal – Army Corps of Engineers; National Marine Fisheries Service (NMFS); EPA; Coast Guard</li> <li>• State – Oregon DEQ; Department of State Lands (DSL); Oregon Water Resources Division; Oregon Fish &amp; Wildlife</li> <li>• Local – City of Portland Bureau of Environmental Services; City of Portland Fire Bureau, City of Portland Harbormaster</li> </ul>	

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EPA Question	Response	Reference
	<p>Health &amp; Safety regulators/authorities include:</p> <ul style="list-style-type: none"> <li>• Federal – U.S. Department of Labor, Office of Worker’s Compensation Programs; Coast Guard</li> <li>• State – State of Oregon, Department of Consumer and Business Services; State of Oregon Worker’s Compensation Division; Oregon OSHA</li> <li>• Local – City of Portland Police Bureau; City of Portland Fire Bureau; Multnomah County Sherriff’s Department</li> </ul> <p>Known contacts from these are addressed below in question 51.</p>	
<p>51. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning each Property during the period being investigated related to health and safety issues and/or environmental concerns. Provide copies of all documents associated with each occurrence described.</p>	<p>The Port did not identify any violations or accidents related to health and safety or environmental concerns during its period of ownership of the Terminal 1 North property; however, the following matters were documented in available records for Port tenants:</p> <ul style="list-style-type: none"> <li>• 4/2/1987 – A U.S. Coast Guard Inspection of Terminals 1 and 2 identified one deficiency at Terminal 1 North in that Western Transportation had stacked “combustible material” more than twelve feet high and had a gas-powered air compressor located near the material. It is not known to what type of material this specifically refers.</li> <li>• 6/29/1999 - OSHA Citation No. F2496-042-99 – related to missing extensions for the access ladder to the under dock area/catwalks.</li> </ul>	<p>See health &amp; safety records at Tab 8.</p>
<p>52. Provide a list of all local, state and federal environmental permits ever issued to the owner or operator on each Property (e.g., RCRA permits, NPDES permits, etc.). Please provide a copy of each federal and state permit, and the applications for each permit, ever issued to the owner or operator on each Property.</p>	<p>The following environmental permits have been issued to the Port:</p> <ul style="list-style-type: none"> <li>• Oregon DEQ - NPDES Municipal Separate Storm Sewer System (MS4) Discharge Permit No. 101314 was issued to the Port on September 7, 1995 and renewed on July 27, 2005. This permit is still in effect.</li> </ul> <p>Copies of the above-referenced permit were included with the Port’s 104(e) response for the Terminal 5 property, which was submitted to EPA on May 16, 2008.</p>	<p>See MS4 permit information in Tab 13 of the Port’s 104(e) response for Terminal 5, submitted to EPA and dated May 16, 2008.</p>
<p>53. Did the owner or operator ever file a Hazardous Waste Activity Notification under the RCRA? If so, provide a copy of such notification.</p>	<p>Not to the Port’s knowledge.</p>	
<p>54. Did the owner or operator’s facility on each Property ever have "interim status" under the RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.</p>	<p>Not to the Port’s knowledge.</p>	

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EPA Question	Response	Reference
55. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.	There is no facility-specific RCRA Identification Number.	
56. Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.	Not applicable.	
57. Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.	Not applicable.	
58. List all federal and state environmental laws and regulations under which Respondent has reported federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq., Oregon Hazardous Substance Remedial Action Law, ORS 465.315, Oregon Water Quality law, ORS Chapter 468(b), Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459. Provide copies of each report made, or if only oral reporting was required, identify the federal and state offices to which such report was made.	<ul style="list-style-type: none"> <li>Federal – Clean Water Act. §404 permits; NPDES (MS4) permit administered by Oregon DEQ.</li> <li>State – Port's NPDES DEQ Municipal Separate Storm Sewer System (MS4) Discharge Permit No. 101314; Hazardous Substance Remedial Action Rules, Division 122 (OAR 340-122-010 through 0590)</li> </ul>	See MS4 permit information in Tab 13 of the Port's 104(e) response for Terminal 5, submitted to EPA and dated May 16, 2008.
59. Provide a copy of any registrations, notifications, inspections or reports required by the Toxic Substances Control Act, 15 USC § 2601 et seq., or state law, to be maintained or submitted to any government agency, including fire marshal(s), relating to PCB(s) or PCB(s) containing materials or liquids on any Property identified in response to Question 4.	Not applicable.	
60. Has Respondent or Respondent's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a report to the Oregon Department of State Lands ("DSL") or any other state agency concerning an incident, accident, spill, release, or other event involving Respondent's leased state aquatic lands? If so, describe each incident, accident, spill, release, or other event and provide copies of all communications between Respondent or its agents and DSL or the other state agency and all documents that were exchanged between Respondent, its agents and DSL or other state agency.	Not to the Port's knowledge.	



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EPA Question	Response	Reference
61. Describe all notice or reporting requirements to DSL that you had under an aquatic lands lease or state law or regulation regarding incidents affecting, or activities or operations occurring on leased aquatic lands. Include the nature of the matter required to be reported and the office or official to whom the notice or report went to. Provide copies of all such notices or reports.	Not applicable.	
<b>Section 6.0 - Releases and Remediation</b>		
<p>62. Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify and provide copies of any document regarding:</p> <ul style="list-style-type: none"> <li>a. when such releases occurred;</li> <li>b. how the releases occurred (e.g. when the substances were being delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);</li> <li>c. the amount of each hazardous substances, pollutants, or contaminants so released;</li> <li>d. where such releases occurred;</li> <li>e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;</li> <li>f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken;</li> <li>g. all persons with information relating to these releases; and</li> <li>h. list all local, state, or federal departments or agencies notified of the release, if applicable;</li> <li>i. include a description of a sulfuric acid spill in May 1989 recorded by the Oregon State Fire Marshall's Office; and</li> <li>j. Specifically provide all information you have regarding spills, releases or waste disposal practices of Cargill, Inc. on any of your Properties.</li> </ul>	See response to Question 22 above. No other responsive information was identified.	
<p>63. Was there ever a spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the Property? If the answer to the preceding question is anything but an unqualified "no", identify:</p> <ul style="list-style-type: none"> <li>a. where the disposal system or floor drains were located;</li> <li>b. when the disposal system or floor drains were installed;</li> <li>c. whether the disposal system or floor drains were connected to pipes;</li> <li>d. where such pipes were located and emptied;</li> <li>e. when such pipes were installed;</li> <li>f. how and when such pipes were replaced, or repaired; and</li> <li>g. whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment.</li> </ul>	Unknown.	

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EPA Question	Response	Reference
<p>64. Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:</p> <ul style="list-style-type: none"> <li>a. amount of soil excavated;</li> <li>b. location of excavation presented on a map or aerial photograph;</li> <li>c. manner and place of disposal and/or storage of excavated soil;</li> <li>d. dates of soil excavation;</li> <li>e. identity of persons who excavated or removed the soil, if other than a contractor for Respondent;</li> <li>f. reason for soil excavation;</li> <li>g. whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents;</li> <li>h. all analyses or tests and results of analyses of the soil that was removed from the Property;</li> <li>i. all analyses or tests and results of analyses of the excavated area after the soil was removed from the Property; and</li> <li>j. all persons, including contractors, with information about (a) through (i) of this request.</li> </ul>	<p>Yes, a UST was removed in 1997.</p> <ul style="list-style-type: none"> <li>a. Approximately 165.8 tons. Refer to <i>Underground Storage Tank Decommissioning Report</i> (Hart Crowser, 1998) for further information.</li> <li>b. See Figure 3 from <i>Underground Storage Tank Decommissioning Report</i> (Hart Crowser, 1998).</li> <li>c. The soil was disposed off-site at TPS Technologies, a permitted thermal treatment facility in Portland, Oregon. See Appendix C of <i>Underground Storage Tank Decommissioning Report</i> (Hart Crowser, 1998).</li> <li>d. December 17, 1997</li> <li>e. Terra Hydr</li> <li>f. Heating oil release identified during UST decommissioning.</li> <li>g. Diesel from a leaking heating oil tank. See Table 1 from <i>Underground Storage Tank Decommissioning Report</i> (Hart Crowser, 1998) for further information.</li> <li>h. NWTPH-HCID and NWTPH-Dx. See Appendix E from <i>Underground Storage Tank Decommissioning Report</i> (Hart Crowser, 1998) for further information.</li> <li>i. NWTPH-Dx, BTEX per EPA Method 8020A, and PAHs per EPA 8270SIM. See Appendix E from <i>Underground Storage Tank Decommissioning Report</i> (Hart Crowser, 1998) for further information.</li> <li>j. Port of Portland, Hart Crowser, and Terra Hydr.</li> </ul>	<p>See site investigation records at Tab 6, specifically:</p> <p>Hart Crowser. 1998. <i>Underground Storage Tank Decommissioning Report, Port of Portland-Terminal 1, Portland, Oregon</i>. March 11, 1998.</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation</i>. September 30, 2005.</p>
<p>65. Have you ever tested the groundwater under your Property? If so, please provide copies of all data, analysis, and reports generated from such testing.</p>	<p>Yes, the groundwater under the Facility has been investigated during environmental investigations. The initial groundwater investigations were conducted as a part of the Pre-Remedial Investigation. References and results are contained in the <i>Pre-Remedial Investigation Assessment</i>; a copy of this report is attached (see Tab 6). Additional groundwater monitoring of onsite wells was completed following the Pre-Remedial Investigation and during the 2005 Remedial Investigation and the subsequent Addendum to the Remedial Investigation. Results of this work are contained in four reports: <i>Groundwater Monitoring Report</i> dated March 2003, <i>Groundwater Monitoring Report</i> dated December 2003, and <i>Terminal 1 North Upland Facility, Remedial Investigation</i> dated September 2005 and <i>Remedial Investigation Addendum</i> dated July 2006. These reports are also attached. Also see response to Question 71.</p>	<p>See site investigation records at Tab 6, specifically:</p> <p>Ash Creek Associates/Newfields. 2006. <i>Remedial Investigation Addendum, Terminal 1 North Upland Facility</i>. July 2006.</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation</i>. September 30, 2005.</p> <p>Hahn &amp; Associates, Inc. 2002. <i>Pre-Remedial Investigation Assessment, Terminal 1 North, 2500 NW Front Avenue, Portland, Oregon</i>. October 14, 2002.</p> <p>Hahn &amp; Associates, Inc. 2002. <i>Monitoring Well Installation and Groundwater Sampling Report, Port of Portland, Terminal 1 North, 2500 NW Front Avenue, Portland, Oregon</i>. October 25, 2002.</p> <p>Hahn &amp; Associates, Inc. 2003. <i>Groundwater</i></p>

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EPA Question	Response	Reference
		<p><i>Monitoring Report, Port of Portland, Terminal 1 North, 2500 NW Front Avenue, Portland, Oregon. March 14, 2003.</i></p> <p><i>Hahn and Associates, Inc. Groundwater Monitoring Report, Port of Portland, Terminal 1 North, 2500 NW Front Avenue, Portland, Oregon. December 11, 2003.</i></p>
<p>66. Have you treated, pumped, or taken any kind of response action on groundwater under your Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:</p> <ul style="list-style-type: none"> <li>a. reason for groundwater action;</li> <li>b. whether the groundwater contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the groundwater contained, and why the groundwater contained such constituents;</li> <li>c. all analyses or tests and results of analyses of the groundwater;</li> <li>d. if the groundwater action has been completed, describe the basis for ending the groundwater action; and</li> <li>e. all persons, including contractors, with information about (a) through (c) of this request.</li> </ul>	No.	
<p>67. Was there ever a spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river? If the answer to the preceding question is anything but an unqualified "no", identify and provide copies of any documents regarding:</p> <ul style="list-style-type: none"> <li>a. the nature of the hazardous substance, waste, or material spilled, leaked, released or discharged;</li> <li>b. the dates of each such occurrence;</li> <li>c. the amount and location of such release;</li> <li>d. were sheens on the river created by the release;</li> <li>e. was there ever a need to remove or dredge any solid waste, bulk product, or other material from the river as a result of the release? If so, please provide information and description of when such removal/dredging occurred, why, and where the removed/dredged materials were disposed.</li> </ul>	See response to Question 22 above.	
<p>68. For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s) or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.</p>	The Port has not identified any records that indicate a release or threatened release of PCBs.	

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EPA Question	Response	Reference
69. For any releases or threatened releases of PCB(s) and/or PCB(s) containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the response or cleanup and any records relating to any enforcement proceeding relating to the release or threatened release.	The Port has not identified any records that indicate a release or threatened release of PCBs.	
<b>Section 7.0 - Property Investigations</b>		
70. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.	<p>The Port has been having communications with its insurers regarding defense and settlement of third party claims associated with the Portland Harbor Superfund Site. The communications between the Port and its insurers are confidential communications in an ongoing insurance settlement process among the Port and its insurers and their respective legal counsel in respect of which the Port and its insurers have common interests adverse to third party governmental agencies and other potentially responsible parties in the Harbor (including associated upland sites) where there is actual or a reasonable likelihood of future litigation. Such communications are attorney-client and work product privileged confidential communications under the common interests doctrine. As relates to Terminal 1 North, the factual information underpinning these confidential communications has, nonetheless, been disclosed in the documents and responses provided to these questions.</p> <p>See also response to Question 51.</p>	
71. Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about each Property. Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.	<p><b>Underground Storage Tank Decommissioning Report-UST 1.</b> This report documents underground storage tank (UST) decommissioning and removal of soil with petroleum hydrocarbons at the Facility. This work was completed by Hart Crowser on behalf of the Port during December 1997 and January 1998.</p> <p>On December 8, 1997, Hart Crowser decommissioned one heating oil UST at the Facility. Activities included completing and documenting decommissioning and collecting soil samples for analysis.</p> <p>Diesel and heavy oil were detected in soil beneath the UST. A release was reported to the DEQ and a LUST number of 26-97-0931 was assigned. A total of 165.8 tons of soil with diesel and heavy oil were excavated and disposed of at TPS technologies.</p> <p>Chemical analyses on soil indicate that all soil above the DEQ Level 2 cleanup goals for diesel was excavated and disposed of, with the exception of soil beneath the warehouse and office building.</p> <p>The Tier 1 RBCA assessment indicates that soil PAH concentrations beneath the warehouse and office building are below RBSLs. Based on the results of the Tier 1 assessment and soil TPH concentrations, the former UST area does not pose an unacceptable risk to human health or the environment. No further action was recommended by Hart Crowser for this site.</p> <p><b>Underground Storage Tank Decommissioning Report-UST 2.</b> The Port retained a contractor to excavate</p>	<p>See property transaction records at Tab 5, specifically:</p> <p>GeoEngineers. 1997. <i>Near Surface Soil Sampling - Bear Springs Lumber Distribution Facility</i>. April 2, 1997.</p> <p>PBS Environmental, 2001. <i>Pre-Entry Phase Two Environmental Site Assessment, 2200 NW Front Avenue, Portland, Oregon</i>. April 2001.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>Hahn and Associates, Inc. <i>Monitoring Well Installation and Groundwater Sampling Report, Port of Portland, Terminal 1 North, 2500 NW Front Avenue, Portland, Oregon</i>. October 25, 2002.</p>



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	<p>UST 2 in December 1997. The UST was observed to be in good condition with no evidence of leaks. Heavy oil-range petroleum hydrocarbons were detected in excavated soils, but were attributed to asphalt in the soil and not heating oil. Petroleum hydrocarbons were not detected in confirmation soil samples from the UST excavation. Given the condition of the excavated UST and the analytical results, it was concluded that the removal did not warrant DEQ involvement. Based on this information, the approved RI Work Plan (2004) concluded that UST 2 is not a source area and NFA was warranted.</p> <p><b>Suspected Former UST.</b> A 680-gallon UST was suspected near a former restroom building northeast of Warehouse No. 3. Century West conducted a geophysical survey at the location of the suspected UST in an attempt to locate the UST; however, no evidence of a UST was detected. Century West concluded that the UST had likely been removed at an earlier date (1995)</p> <p><b>Geotechnical Boring PB-003LD (OU1).</b> During the City of Portland's installation of a geotechnical boring (PB-003LD) at the northwest corner of OU1 in March 2001, non-aqueous phase liquids (NAPL) consistent with a weathered heavy range hydrocarbon (diesel and oil hydrocarbon range) was encountered at depths between 27 and 33 feet bgs. Nearby downgradient borings installed as a part of the remedial investigation of the facility did not encounter NAPL, demonstrating that the presence of the NAPL at the facility was limited in extent. Due to the upgradient location of the boring and no known sources at the Terminal 1 North property, it was concluded that the NAPL was likely from an off-site, upgradient source, likely adjacent PGE facilities (DEQ, 2004). Records reviewed for adjacent properties revealed PGE historically owned and operated an oil supply pipeline that traversed east to west just north of OU1 (on property currently owned by Sulzer Pumps US). The oil pipeline was used to transfer Bunker C fuel from vessels on the Willamette River to USTs associated with PGE's Substation E (a steam electric generating plant), which is northwest of NW Front Avenue. According to reports contained in the DEQ LUST file for the facility, PGE removed three of the tanks in 1995 and it is possible a fourth tank is still in place. Free product was encountered during the removal of a 90,000 gallon tank and although 5,145 tons of petroleum-contaminated soil was removed from the excavation areas, two areas of soil contamination were left in place. The first area, which is directly adjacent to NW Front Avenue showed TPH concentrations in soil ranging from 2,600 to 61,000 ppm. The second area, which is beneath the concrete stack foundation, exhibited TPH concentrations ranging from 6 to 4,800 ppm (Port, 2003).</p> <p><b>Bear Springs Lumber Distribution Facility Paint Disposal Activities (OU2).</b> Two areas of surface staining from dried paint were identified at the Bear Springs leasehold during a 1996 Phase I ESA of the site. Soil sampling was conducted in the identified areas. Soil samples were analyzed for lead and VOCs; lead was detected at concentrations consistent with regional background (detected concentrations of 6.2 mg/kg or less) and, with the exception of one detection of acetone (0.036 mg/kg), VOCs were not detected in the soil samples. See also response to Question 11.</p> <p><b>Pre-Entry Phase Two Environmental Site Assessment (OU1).</b> Seven borings were completed in March 2001 as part of a Phase Two ESA at OU1. The purpose of the Phase Two was to establish a baseline prior to the lease of the property by Multnomah County for its temporary booking facility. The Phase Two investigation was conducted prior to the initiation of construction activities and was focused on evaluating areas where either 1) asphalt was likely to be disturbed, or 2) where construction equipment that contains petroleum products might be used (e.g., generators). The scope of the assessment included field screening soil for the presence of</p>	<p>Hahn and Associates, Inc. <i>Pre-Remedial Investigation Assessment, Terminal 1 North, 2500 NW Front Avenue, Portland, Oregon.</i> October 14, 2002.</p> <p>Hahn and Associates, Inc. <i>Groundwater Monitoring Report, Port of Portland, Terminal 1 North, 2500 NW Front Avenue, Portland, Oregon.</i> March 14, 2003.</p> <p>Hahn and Associates, Inc. <i>Groundwater Monitoring Report, Port of Portland, Terminal 1 North, 2500 NW Front Avenue, Portland, Oregon.</i> December 11, 2003.</p> <p>Hart Crowser. <i>Underground Storage Tank Decommissioning Report, Port of Portland – Terminal 1, Portland, Oregon.</i> March 11, 1998.</p> <p>BBL/Ash Creek Associates/Newfields. 2005. <i>Terminal 1 Upland Facility Remedial Investigation.</i> September 30, 2005.</p> <p>Hart Crowser. 1998b. <i>Memorandum Re: Heating Oil UST Decommissioning, Port of Portland – Terminal 1.</i> March 13, 1998.</p> <p>CH2MHill Memorandum to Parsons Brinckerhoff RE: West Side CSO Tunnel Project regarding Port of Portland, Terminal 1 North, Boring PB-003LD, dated May 9, 2001.</p> <p>Oregon Department of Environmental Quality, letter to Port of Portland RE: Final RI Work Plan. February 17, 2004.</p> <p>Port of Portland, letter to Oregon Department of Environmental Quality RE: Terminal 1 North Upland Facility Voluntary Cleanup Program Agreement – Request for DEQ Concurrence that Port is Not Liable to Investigate Off-Site Sources of Contamination Impacting Northwest Corner of</p>

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	<p>petroleum hydrocarbons, and selecting one sample from each boring for laboratory analysis using NWTPH-HCID. Field screening did not indicate the presence of petroleum hydrocarbons, and no concentrations of petroleum hydrocarbons were detected in the samples. Boring logs for the Phase Two ESA indicate groundwater was not encountered.</p> <p><b>Pre-Remedial Investigation Assessment.</b> At the request of the Port of Portland, Hahn completed pre-remedial investigation assessment activities at the Facility during May 2002. The work activities were conducted to gather sufficient information to assess overall soil and groundwater quality of the site while targeting specific areas with the highest potential for environmental impact as determined by review of Port supplied documents.</p> <p>Soil analytical results indicated the following: BTEX and chlorinated solvents were not found above laboratory reporting limits; Benzo(a)pyrene, was detected in two samples that exceeded the industrial PRG screening value; Diesel and oil-range petroleum hydrocarbons were detected in 8 of 38 push probe locations. Arsenic was detected above the PRG screening level, but was below background concentrations.</p> <p>Groundwater analytical results indicated the following: BTEX compounds were not detected in groundwater samples, except for xylene at one location; VOCs were not detected at concentrations of concern, (e.g., risk screening level concentrations); PAHs were detected in 14 grab groundwater samples; and total metals were detected in all the grab groundwater samples.</p> <p><b>Monitoring Well Installation and Groundwater Sampling Report.</b> Seven monitoring wells were installed, developed and sampled to better assess the results obtained from the push-probe investigation. Monitoring well installation and groundwater sampling activities were conducted at the Facility in July and August 2002. Groundwater samples were collected from all seven wells that were installed at the site.</p> <p>Results of the groundwater monitoring well sampling indicated a few of VOCs at concentrations below EPA PRGs and DEQ SLVs; diesel and/or oil-range petroleum hydrocarbons above laboratory reporting limits in three wells at the northeast corner of the site; PAHs were detected in four wells; and chromium and lead concentrations detected at one location above EPA PRG or SDWA that weren't attributable to background levels.</p> <p>Monitoring samples were compared to previous push-probe groundwater samples. The comparison indicated that the push probe sampling data overestimated PAH and metals concentrations in groundwater, most likely due to the more turbid nature of push probe samples resulting in higher suspended solids and particulates.</p> <p><b>Groundwater Monitoring Report-December 2002.</b> The Port of Portland retained Hahn and Associates, Inc. to conduct Pre-Remedial Assessment activities required by the Oregon Department of Environmental Quality (DEQ) at the Facility. The work activities conducted on December 11, 2002 included sampling of the seven groundwater monitoring wells at the site. All work was conducted according to the Work Plan for Site Investigation (2002), Work Plan Addendum (2002), and DEQ recommendations presented in a November 15, 2002, meeting.</p> <p>Analytical results were consistent or indicated lower concentrations than the previous groundwater sampling</p>	<p>the Property. July 29, 2003.</p> <p>URS Corp. 2004. <i>Final Work Plan for Remedial Investigation, Terminal 1 North Upland Facility, Port of Portland.</i> February 2004.</p> <p>Ash Creek Associates/Newfields. 2006. <i>Remedial Investigation Addendum, Terminal 1 North Upland Facility.</i> July 2006.</p>

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	<p>results.</p> <p>A potential correlation between PAHs, metals and TSS levels was been identified. Procedures to minimize sampling-induced TSS were recommended to be implemented in future sampling events.</p> <p><b>Groundwater Monitoring Report-March and June 2003.</b> The Port of Portland retained Hahn and Associates, Inc. to conduct Pre-Remedial Assessment activities required by the Oregon Department of Environmental Quality (DEQ) at the Facility. The work activities were conducted in March and June 2003 and included two separate sampling events of the seven groundwater monitoring wells at the site. All work was conducted according to the Work Plan for Site Investigation (2002), Work Plan Addendum (2002), and DEQ recommendations presented in a November 15, 2002, meeting.</p> <p>Analytical results indicated the following: VOCs were not detected above EPA PRGs or DEQ SLVs; Diesel- and oil-range petroleum hydrocarbons were most-frequently detected at MW-6, from an offsite up-gradient property; PAHs were detected in groundwater at the wells with benzo(a)anthracene and benzo(a)pyrene exceeding the EPA PRGs and DEQ SLVs; Of the 13 metals analyzed, only arsenic was detected at levels above PRG screening levels at most well locations, while copper and lead exceeded the SLVs during the March and June 2003 sampling event, respectively.</p> <p>In general, total suspended solids (TSS) decreased in the groundwater samples in these two events and it was concluded that low flow sampling techniques provided more representative data for evaluation of groundwater quality at the site.</p> <p><b>Remedial Investigation.</b> URS performed additional field investigations in accordance with the approved RI Work Plan to fill data gaps relative to the potential source areas. Soil and groundwater characterization activities were performed to define magnitude and extent of COIs at potential source areas, to generate analytical data in support of human health and ecological risk evaluations, and to evaluate whether onsite sources have the potential to impact sediment and surface-water quality in the Willamette River.</p> <p>Three potential source areas were identified that required further assessment to complete the RI: at OU1, the Suspected Former UST and the northern portion of Warehouse No. 101; and at OU2, the Wood-Filled Ravine/Former Auto Shop. The investigations of these areas consisted of drilling nine subsurface borings, installing three monitoring wells, and collecting soil and groundwater samples from these locations.</p> <p>Results from the investigations at OU1 are as follows: In the Suspected Former UST area three initial soil borings were installed. Metals, PAHs, and VOC concentrations were not indicative of a release from the Suspected Former UST; residual-range organics TPH were detected at concentrations up to 2,800 mg/kg (without silica gel cleanup; the chromatographs indicated that the pattern was not consistent with petroleum hydrocarbons). Three additional borings were installed in this area to better assess whether the Suspected Former UST had impacted Facility soil. The PAH, metals, and VOC results were consistent with the previous results. TPH concentrations were low to nondetect, supporting that the initial detections are residual organics, not petroleum hydrocarbons. The collective set of data supported that the Suspected Former UST Area was adequately assessed and the results are not indicative of a release from the Suspected Former UST. Groundwater</p>	

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	<p>sampling results from wells installed downgradient of the suspected UST are consistent with the soil sampling results and support that the suspected UST is not a source of constituents to groundwater and the area has been adequately defined. In the northern portion of Warehouse No. 101 four initial borings and one monitoring well were installed in and around the area of Warehouse No. 101. Metals, PAH, and VOC concentrations were not indicative of a release; however, residual-range organics TPH were detected at concentrations up to 1,700 mg/kg (without silica gel cleanup; the chromatographs indicated that the pattern was not consistent with petroleum hydrocarbons). Four additional borings and one additional monitoring well were installed to further assess this area. The PAH, metals, and VOC results were consistent with previous results. PCBs were not detected in area samples. TPH concentrations were low to nondetect, and support that TPH concentrations are related to non-petroleum organics. The collective set of data support that the Warehouse No. 101 area was adequately assessed and the results are not indicative of a release from past activities. Groundwater sampling results from wells installed in or adjacent to Warehouse 101 support that the area is not a source of constituents to groundwater.</p> <p>Results from the investigations at OU2 are as follows: Two initial borings and one initial monitoring well were installed in the Wood-Filled Ravine/Former Auto Shop area at OU2. Metals, PAH, VOC, and TPH concentrations in soil samples were not indicative of a release; however, the RI Work Plan proposed two additional borings and one additional monitoring well in the area for additional coverage. The PAH, metals, and VOC soil results were consistent with previous results. Diesel- and residual-range organics TPH were detected. However, as described above, silica gel cleanup was not used prior to soil sample analysis and the resulting TPH concentrations likely contain a significant amount of residual non-TPH organics given the woody nature of the fill in the area. The collective set of data support that the Wood-Filled Ravine/Former Auto Shop Area has been adequately assessed and the results are not indicative of a release from past activities. Constituent concentrations in groundwater in the Wood-Filled Ravine/Former Auto Shop Area are low and not indicative of a source or release.</p> <p>Results from the investigations outside of potential source areas are as follows: Metals, PAH, and VOC concentrations in soil samples collected outside of the identified potential source areas were generally consistent with those collected within the potential source areas and support that the detections are not associated with former releases or site activities, but rather are consistent with general waterfront fill. Constituent concentrations in groundwater outside of the identified potential source areas are low and not indicative of a source or release. Lead concentrations in the southeast well increased during the most recent two sampling events and were concluded to be related to the City of Portland's CSO construction at OU1.</p> <p><b>Remedial Investigation Addendum.</b> Following completion of the Remedial Investigation Report (2005), the issue of lead concentrations above ecological screening level values in well MW-4 remained. Additional groundwater monitoring of well MW-4 and further risk evaluation were recommended. The Groundwater monitoring was conducted at well MW-4 for two additional events following the Remedial Investigation (2005). The samples were collected on August 31 and December 13, 2005.</p> <p>Results of the two additional sampling events showed a significant drop in the dissolved phase lead concentrations, while the total lead concentrations remained relatively high. The fact that both dissolved and total lead were initially elevated in the May 2004 and April 2005 samples followed by a significant decrease in the dissolved concentrations by August 2005 supports that a short-term disturbance of the groundwater</p>	



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	conditions likely caused the short-term increase in lead concentrations near well MW-4.	
72. Describe any remediations or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance plans, completion reports, or other document concerning remediation or response actions taken on each Property.	See responses to Questions 70 and 71 for the remediation and response actions conducted at the site.	
73. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, and hydrology or air quality on or about the Property? If so, identify: a. what the nature and scope of these investigations will be; b. the contractors or other persons that will undertake these investigations; c. the purpose of the investigations; d. the dates when such investigations will take place and be completed; and e. where on the Property such investigations will take place.	No.	
<b>Section 8.0 - Corporate Information</b>		
74. Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:	See response to bullets (a) through (e) below.	
a. state the current legal ownership structure (e.g., corporation, sole proprietorship);	The Port of Portland was created by the Oregon legislature in 1891. Oregon Revised Statutes 777 and 778 contain the authority of the Port of Portland. It is a state Port District for an area encompassing all of Multnomah, Clackamas and Washington Counties. The Port is governed by a nine person commission appointed by the Governor of Oregon and confirmed by the State Senate.	See ORS 778 and 777 at Tab 8.
b. state the names and current addresses of current and past owners of the business entity or, if a corporation, current and past officers and directors;	Port of Portland 121 NW Everett Portland, OR 97209	

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c. discuss all changes in the business' legal ownership structure, including any corporate successorship, since the inception of the business entity. For example, a business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the dates and the names of all parties involved;	Not applicable.	
d. the names and addresses of all current or past business entities or subsidiaries in which you or your business has or had an interest that have had any operational or ownership connection with the Properties identified in response to Question 4. Briefly describe the business activities of each such identified business entities or subsidiaries; and	Not applicable.	
e. if your- business formerly owned or operated a Property identified in response to Question 4, describe any arrangements made with successor owners or operators regarding liability for environmental contamination or property damage.	Not applicable.	
75. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:	Port of Portland Registered Trademark Name - Rivergate Industrial District	
a. whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;	Yes, the Port of Portland is extant.	
b. names, addresses, and telephone numbers of all registered agents, officers and operations management personnel; and	<p>Registered Agent:  Carla L. Kelley  General Counsel  Port of Portland  121 NW Everett Street  Portland, OR 97209  503-944-7031</p> <p>President, Port Commission  Judith A. Johansen  (b) (6)  Lake Oswego OR 97034  Home: (b) (6)</p> <p>Vice President, Port Commission  Mary F. Olson  Norris, Olson &amp; Associates, Inc.  7105 SE 19<sup>th</sup> Ave.  Portland OR 97202  503-235-2425</p>	

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EPA Question	Response	Reference
	<p>Treasurer, Port Commission  William D. Thorndike, Jr  Medford Fabrication  PO Box 1588  1109 Court Street  Medford OR 97501  541-770-1172</p> <p>Secretary, Port Commission  Steven H. Corey  Corey, Byler, Rew, Lorenzen &amp; Hojem  PO Box 218  Pendleton OR 97801</p>	
c. names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent.	Not applicable.	
76. Provide all copies of the Respondent's authority to do business in Oregon. Include all authorizations, withdrawals, suspensions and reinstatements.	Oregon Revised Statutes 777 and 778.	See ORS 777 and 778 at Tab 8.
77. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:	Not applicable.	
a. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;	Not applicable.	
b. the dates such relationship existed;	Not applicable.	
c. the percentage of ownership of Respondent that is held by such other entity(ies);	Not applicable.	
d. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;	Not applicable.	
e. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at each Property; and	Not applicable.	



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f. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.	Not applicable.	
78. If Respondent is a partnership, please describe the partnership and provide a history of the partnership's existence. Provide a list of all current and past partners of any status (e.g., general, limited, etc.) and provide copies of all documents that created, govern, and otherwise rules the partnership, including any amendments or modifications to any of the originals of such documents, and at least five years of partnership meeting minutes.	Not applicable.	
<b>Section 9.0 - Compliance With This Request</b>		
79. Describe all sources reviewed or consulted in responding to this request, including, but not limited to:	Records reviewed for this request include the following Port departments:  Marine and Industrial Development (MID) Environmental Affairs Legal Research Engineering	
a. the name and current job title of all individuals consulted;	Nicole LaFranchise (Environmental Project Manager), Sara Moore (Environmental Liability Analyst), , Sebastian Degens (Marine Planning & Development Manager), Suzanne Brooks (Property Manager), Suzanne Barthelme (Claims Manager), Mic Dorrance (Marine Maintenance Manager), Scott Carter (Property Manager), Loralie Sinnen (Property Manager II), Sheila David (Environmental Analyst), Sabrina Rowlette (Environmental Technician)	
b. the location where all sources reviewed are currently reside; and	Port of Portland offices and records storage	
c. the date consulted.	June-July 2008	
80. If not already provided, identify and provide a last known address or phone number for all persons, including Respondent's current and former employees or agents, other than attorneys, who have knowledge or information about the generation, use, purchase, storage, disposal, placement, or other handling of hazardous materials at, or transportation of hazardous substances, waste, or materials to or from each Property identified in response to Question 4.	Not applicable.	

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81. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following;	Records Review and Destruction Notices were reviewed to determine if any relevant records were destroyed pertaining to the Terminal 1 North property. Consistent with public-recordkeeping requirements, the Records Review and Destruction Notices are maintained at the Port of Portland Administrative office. The Destruction Notices contain standard information including the former archive box number, originating department, and date of destruction. Limited information is provided on the contents of the files formerly contained within the boxes; records are described generally, using categories such as "miscellaneous correspondence," "chronological files," "memos," etc. While some provide a reference to a property to which the records may have pertained, it is so general that there is no way to determine with any certainty the nature or content of the documents that were destroyed.	
a. the document retention policy between 1937 and the present;	<p>The Port is required by law to retain all "public records" for at least the period of time specified in a retention schedule approved by the State Archivist. The Port of Portland Records Retention and Disposition Schedule is the approved retention schedule for the Port of Portland. "Public records" include documents, books, papers, photographs, files, sound recordings, or machine-readable electronic records, regardless of physical form or characteristics, which are made, received, filed, or recorded by the Port in connection with the transaction of Port business.</p> <p>Employees must adhere to records retention and destruction procedures established by the Port's records manager in accordance with State statutes and the Port of Portland Records Retention and Disposition Schedule.</p> <p>The Port's retention and disposition schedules were suspended for records relevant to Portland Harbor when the Port received notice of Portland Harbor's listing on the National Priority List in December 2000.</p>	<p>See records management information at Tab 8, specifically:</p> <ul style="list-style-type: none"> <li>• Ordinance 142</li> <li>• Ordinance 149</li> <li>• Ordinance 196</li> <li>• 2001 Records Retention Schedule</li> <li>• 2001 Records Retention with 2003 Revision</li> <li>• 2008 Records Retention Schedule</li> </ul>
b. the approximate date of destruction;	At this time, no Port documents have been identified as destroyed. During the City CPD's ownership (1946-1971), however, a fire destroyed the CPD administrative offices in 1948. It is possible records relevant to the Terminal 1 North property were destroyed at that time.	
c. a description of the type of information that would have been contained in the documents;	Not applicable	
d. the name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; the person(s) who would have been responsible for destroying the documents; and the person(s) who had and/or still have the originals or copies of these documents; and	<p>Michael Wells  Records Manager  Port of Portland  121 NW Everett Street  Portland, OR 97209</p>	
e. the names and most current addresses of any person(s) who may possess documents relevant to this inquiry.	None known.	
82. Provide a description of all records available to you that relate to all of the questions in this request, but which have not been included in your responses.	The Port believes that it is reasonably likely that it will be in litigation with others over the responsibility for contamination in the Portland Harbor Superfund Site adjacent to Terminal 1 North. Work product in anticipation of litigation and written communications in order for the Port to obtain legal advice relating to the environmental liability issues associated with Terminal 1 North, including attorney-client and work product	


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	communications, are not disclosed as part of this submission; however, no underlying facts referenced in such confidential communications that are responsive to these questions have been withheld on these confidentiality grounds. See also response to Question 70. This response is based on the documents the Port has been able to identify and review to date. If additional information responsive to this request becomes available or is encountered, it will be submitted under separate cover.	

## DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent and that the attached response for Terminal 1 North is complete, true, and correct to the best of my knowledge.

Executed on July 15, 2008

  
Signature

Tom Imeson  
Print Name

Public Affairs Director  
Title

Mailing Address:  
Port of Portland  
P.O. Box 3529  
Portland, OR 97208  
Phone (503) 944-7000

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**JUL 17 2008**

**Environmental  
Cleanup Office**

Port of Portland  
104(e) Response  
Terminal 1 North  
July 16, 2008

**Ms. Kristine Koch  
US Environmental Protection Agency  
Region 10  
1200 Sixth Avenue, Suite 900  
M/S ECL-115  
Seattle, WA 98101-3140**